

**Africa Bureau**  
**Recommended Acceptable Language and Formats (RALF)**  
**to Use in Preparing Requests for Categorical Exclusions and**  
**IEEs**

*An Evolving Tool to Assist Preparers*

by

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Draft of December 19, 2004

Latest Edits, Updates, Additions:

- BDH 6/10/04: updated EGSSAA hyperlinks
- WIK 6/11 & 6/14/04. Added, adjusted ToC; added info and links on Fertilizers and Environmental Screening; adjusted Monitoring and Compliance hyperlinked contents list; tweaked IEE/CE templates; adjusted DCA content; added GDA content and hyperlinks
- WIK 6/15/04: added Seeds, Exotic species items & hyperlinks;
- WIK 6/17/03 Biosafety footnote, adjustments. Added Cleaner Production, fertilizer, livestock materials & links.
- BDH 6/21/04: revised Medwaste conditions; updated links in construction conditions; updated links in watsan conditions; added 4<sup>th</sup> optional paragraph for ADS204 reference; expanded the Positive Determination reference to include citations for elements of the EA.
- WIK 11/8/04: Example of RCE in template
- BDH 12/19/04: Editorial changes, formatting, regrouping all over. New table of contents.

Note: for generating the Table of Contents, format headings using Heading Styles, Heading 1, Heading 2 and Heading 3.

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## INTRODUCTION

This “[Recommended Acceptable Language and Formats \(RALF\)](#)” is a resource and tool intended for use by IEE drafters, and it is where “standard” paragraphs, phrases and citations that are commonly employed and reused in the drafting of IEEs are stored. This content is primarily useful in the preparation of IEE section *3.0 Evaluation Of Project/Program Issues With Respect To Environmental Impact Potential*, and section *4.0 Recommended Threshold Decisions and Mitigation Actions (Including Monitoring and Evaluation)*.

In this document are a few snippets that are unchanging, such as citations from 22CFR216 (Reg. 216), as well as many paragraphs and phrases that are subject to periodic revision and refinement, such as recommended sets of conditions for various types of activities. This collection is therefore constantly changing, and persons who undertake to prepare an IEE for a USAID program in Africa should take care to access the most recent version of this document from the ENCAP website via the link above.

The objectives of this document are multifold:

1. Save time and effort for IEE writers, allowing more time for analysis and monitoring;
2. Promote consistency across the region of IEE language used and of risk management decisions, which are embodied in the conditions proposed;
3. Increase the likelihood of IEEs being cleared without substantial edits or rewriting.

The use of this language is recommended, not required. Its use, in part or in whole, is up to the discretion of the IEE author. But in the interest of the above objectives, IEE authors are strongly encouraged to start with RALF language, if appropriate to the situation, and then amend/abridge/add to as needed.

The content of this document is informed by all the Environmental Officers in the Africa region as well as the General Counsel’s office. Maintenance of the document is primarily the responsibility of AFR/Office of Sustainable Development, with REDSO/ESA, and questions or comments should be addressed to [Brian Hirsch](#), AFR/SD or [Walter Knausenberger](#), REDSO/ESA.

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## CLASSIFICATION OF ACTIVITIES PRIOR TO IEE

A **positive determination** is recommended per 22 CFR 216.2(d)(2), and an Environmental Assessment will be prepared, per 22 CFR 216.6. **NOTE:** this applies when the classes of action involved are considered *a priori* to have a high potential for adversely affecting the environment, and normally would require an EA (as listed in the section cited above), and no IEE need be prepared, although for record keeping and to get BEO confirmation of the positive determination, most missions will submit an IEE.

A **deferral of a threshold determination**, per 22 CFR 216.3(a)(7)(iii), is recommended pending clearer identification of the activities to be undertaken. The activity(ies) involved may not proceed until the IEE is amended to remove the deferral, once the appropriate environmental review has occurred.

An **exemption from environmental examination** is recommended for these activities per 22CFR216.2(b)(1)(i) [international disaster assistance] . **NOTE:** This applies only when an official declaration of emergency has been made.

### Acceptable format for citing **Categorical Exclusions**:

A **categorical exclusion** is recommended for these activities, per...

22CFR216.2(c)(2)(i) [education, technical assistance, training]

22CFR216.2(c)(2)(ii) [controlled experimentation]

22CFR216.2(c)(2)(iii) [analyses, studies, workshops and meetings]

22CFR216.2(c)(2)(v) [document and information transfer].

22CFR216.2(c)(2)(viii) [nutrition, health care or population and family planning services], and,

22 CFR 216.2(c)(2)(xiv) [programs to develop capability of recipient countries and organizations in development planning].

**But preferred is the following approach (the most commonly used ones are listed first, a-g):???**

A **Categorical Exclusion** is recommended for activities under IRs x.x, x.x, ..., except to the extent that the activities directly affect the environment (such as construction of facilities), pursuant to:

a) 22 CFR 216.2(c)(2)(i), for activities involving education, training, technical assistance or training programs;

b) 22 CFR 216.2(c)(2)(ii), for activities involving controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas (for this IEE, defined as an area which is smaller than 4 hectares) and carefully monitored;

c) 22 CFR 216.2(c)(2)(iii), for activities involving analyses, studies, academic or research workshops and meetings;

d) 22 CFR 216.2(c)(2)(v), for activities involving document and information transfers;

e) 22 CFR 216.2(c)(2)(viii), for programs involving nutrition, health care, or 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.);

(f) 22 CFR 216.2(c)(2)(xi) Programs of maternal or child feeding conducted under title II of Pub. L. 480; and

(g) 22 CFR 216.2(c)(2)(xiv), for studies, projects or programs intended to develop the capability of recipient countries and organizations to engage in development planning.

**Categorical Exclusions** are recommended for the following classes of activities under IRs 14.1, 14.2, and 14.3, except to the extent that the activities directly affect the environment (such as construction of facilities). Specifically, this is for activities covered by the following citations in Reg. 216, by subparagraph of 22 CFR 216.2(c)(2):

(i) Activities involving education, training, technical assistance or training programs;

(ii) Activities involving controlled experimentation exclusively for the purpose of research and field evaluation and carefully monitored;

(iii) Activities involving analyses, studies, academic or research workshops and meetings;

- (v) Activities involving document and information transfers;
- (viii) Programs involving nutrition, health care, or 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.);
- (xi) Programs of maternal or child feeding conducted under Title II of Public Law 480; and
- (xiv) Studies, projects or programs intended to develop the capability of recipient countries and organizations to engage in development planning.

**Categorical Exclusions rarely used [or appropriate] in today's assistance environment:**

(iv) Projects in which [USAID] is a minor donor to a multi-donor project and there is no potential for significant effects upon the environment of the United States, areas outside any nation's jurisdiction or endangered or threatened species or their critical habitat;

(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));

(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 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;

(xii) Food for development programs conducted by food recipient countries under title III of Pub. L. 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;

(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;

**Categorical Exclusion never appropriately applied, because there have never been any such design criteria or standards officially approved:**

- (xv) Activities which involve the application of design criteria or standards developed and approved by [USAID].

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## CLASSIFICATION OF ACTIVITIES WITHIN AN INITIAL ENVIRONMENTAL EXAMINATION (IEE)

For the “grey areas” when it is not obvious that an activity falls into one of the above categories, it is necessary to prepare an IEE to make that determination. Mission Environmental Officers and Regional Environmental Officers can assist in the preparation of the IEE, and recommending threshold decisions (or determinations). Bureau Environmental Officers approve the Threshold Decisions based on the IEE.

### 22 CFR CITATIONS FOR THRESHOLD DETERMINATIONS

A **negative determination (with or without conditions)** is recommended per 22CFR216.3(a)(2)(iii).

Conditions are not specifically cited in Reg. 216. They represent an adaptation by the Africa Bureau to identify the measures needed to ensure that the risk of environmental harm stays within acceptable bounds. Conditions are used as mitigation measures are, and should be formulated to minimize the impacts of foreseeable environmental effects.

**With conditions: this seems to be hanging.....** was something supposed to go here?

This is confusing, is this what the drafter would write or is this advice to the drafter? It is also repetitive with previous page.

A **positive determination** is recommended per 22CFR216.3(a)(2)(iii) and an environmental assessment will be prepared. The scope of this assessment will be determined following procedures described in 22CFR216.3(a)(4), and the content of the assessment will follow the requirements of 22CFR216.6.

A **deferral of a threshold determination**, per 22 CFR 216.3(a)(7)(iii), is recommended pending clearer identification of the activities to be undertaken. The activity(ies) involved may not proceed until the IEE is amended to remove the deferral, once the appropriate environmental review has occurred.

An **exemption from environmental examination** is recommended for these activities per 22CFR216.2(b)(1)(i) [international disaster assistance]

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## MONITORING AND COMPLIANCE ASSURANCE

It seems to me that the IEEs that I've reviewed just pick these words up and put them in the IEE and don't give it any add'l thought. I'd like to add something here about describing the SO's method for carrying out monitoring:

ADS references to compliance assurance [esp. at end of face sheet summary and other relevant places, adapted]:

As required by ADS 204.5.4, the SO team will actively monitor ongoing activities for compliance with approved IEE recommendations, and modify or end activities that are not in compliance. If additional activities are added to this program that are not described in this document, an amended environmental examination must be prepared.

OR...

As required by ADS 204.5.4, the SO team will actively monitor ongoing activities for compliance with approved IEE recommendations, and modify or end activities that are not in compliance. If the activities in this program are materially modified, the SO team is responsible for assuring that the active environmental documentation is amended appropriately.

Or...

As required by ADS 204.5.4, the SO team and activity implementing partners will actively monitor and evaluate whether the environmental features designed for the activity resulting from the 22 CFR 216 process are being implemented effectively and whether there are new or unforeseen consequences arising during implementation that were not identified and reviewed in accordance with 22 CFR 216. If additional activities not described in this document are added to this program, an amended environmental examination must be prepared and approved.

Or...

As required by ADS 204.5.4, the SO team must actively monitor ongoing activities for compliance with approved IEE recommendations, and modify or end activities that are not in compliance. If additional activities not described in this document are added to this program, then amended or new environmental documentation must be prepared. The SO team will also ensure that provisions of the IEE concerning mitigative measures and the conditions specified herein along with the requirement to monitor be incorporated in all contracts, cooperative agreements, grants and sub-grants.

Sub-grants or other funds transfers by implementing partners made consistent with the IEE

Any grants or other monetary transfers of USAID funds (e.g., subgrants) to support this program's activities must incorporate provisions that the activities to be undertaken will comply with the environmental determinations and recommendations of this IEE. This includes assurance that the activities conducted with USAID funds fit within those described in the approved IEE or IEE amendment and that any mitigating measures required for those activities be followed.

See [Environmental Screening](#) below.

[NOTE: include alternative of Environmental Review Report (ERR) format, as now in the EGSSAA Part III (<http://www.encapafrika.org/SmallScaleGuidelines.htm>). Use the most recently revised version of the , which WIK revised in April 2004...]

Besides incorporating the standard language for monitoring, the IEE should include a short description of how the SO Team intends to conduct monitoring, ensure compliance, and report on status. Some examples, which the SO Team can build upon include:

- Implementing partners' annual reports and, as appropriate, progress reports shall contain a brief update on

mitigation and monitoring measures being implemented, results of environmental monitoring, and any other major modifications/revisions in the development activities, and mitigation and monitoring procedures.

- USAID/(Country) will report to the REO and the BEO on an annual basis on the status of environmental screening and review and the implementation of mitigation and monitoring requirements. This report should draw upon implementing partners' progress and annual reports, as well as on periodic site visits by the MEO and REO.
- USAID/(Country) is responsible for monitoring and evaluation of activities after implementation with respect to environmental effects. A process will be integrated into the SO's pertinent Performance Monitoring and Evaluation Plan which will involve periodic field visits.
- USAID/(Country) is responsible for assuring that implementing partners have the human capacity necessary to incorporate environmental considerations into program planning and implementation and to take on their role in the Environmental Screening Process. Implementing partners should seek training as needed, such as through participation in the Africa Bureau's regional ENCAP training courses.

Financial Services, Financial Intermediation, Intermediate Credit Institutions (ICI), Microfinance Institutions (MFI)

Micro, Small, and Medium Enterprises (MSE, SME), Business Development Services (BDS), etc.

**Loan funds, micro-finance, and micro-enterprise support. A Negative Determination with Conditions**

recommended pursuant to 22 CFR 216.3(a)(2)(iii) for support to micro-finance institutions and MSEs (IR x.x, x.x).

We recommend this condition (or similar) in cases where MFIs or MSEs are using USAID funds, and the activities may have an effect on the environment:

**Conditions:** SO Team shall assist MFI and MSE credit and service providers to institutionalize environmental reviews of credit and service projects and individual activities. MSEs & MFIs shall receive training in the use of environment guidelines. The guidelines will illustrate how environmentally sound practices can be used to improve the effectiveness and efficiency of doing business.

I never liked this "urged to": it really has no meaning—as well as the rest of the above condition. See above edits, my suggestions.

Also, some where in this document, it should be stated that conditions should be designed to mitigate an identified impact, I find far too many times that conditions are kind of floating out there! (I just added a sentence to page 7 re this).

Condition: Activities relating to the expansion of microfinance and or micro enterprise shall be subjected to environmental review. The Environmental Review Form in the EGSSAA shall be tailored as needed, to assist in identifying potential environmental impacts that are likely to occur as a result of such micro enterprise activities. The ERF helps to classify such potential impacts into low risk medium risk and high risk categories. Mitigation measures will be identified for all medium and high risk categories. (SO Team will use guidelines in USAID Bureau for Africa's [Environmental Guidelines for Small-Scale Activities in Africa](#) (EGSSAA) Part III, "Guidelines for Micro and Small enterprises") In addition, the SO team leader shall visit all such projects during implementation to ensure that they are not likely to cause any adverse environmental impacts, with a view to correcting and or initiating additional mitigation measures.

Condition: SO Team shall sponsor the environmental management course, "Improving Micro- and Small Enterprise Success through Cleaner Production" for SO 7 partners (<http://www.encapafrika.org/coursepage.htm>.) This will provide an opportunity to strengthen leadership and innovation in environmental capacity-building for business service organizations (BSOs) that assist small and medium enterprises (SMEs).

# SECTOR-SPECIFIC GUIDANCE AND CONDITIONS

## General Use of Environmental Guidelines

As noted above, a key resource which should inform the SO and its implementing partners in their design and implementation of [these] activities is the Africa Bureau *Environmental Guidelines for Small-Scale Activities in Africa (EGSSAA)* (<http://www.encapafrica.org/SmallScaleGuidelines.htm>). The SO team should assure that implementing partners have access to these and other appropriate Africa Bureau and generic environmental assessment resources. Such resources will help these partners to be aware of potential impacts to of different types of development activities in various settings.

EGSSAA chapters of particular relevance to the SO's program are the following (select or delete rows as appropriate):

### PART II - Sector Specific Guidelines

	Title	Download English Version	Download French Version	Resource List
	Part II Introduction	<a href="#">pdf</a> (8K)	--	--
1	Agriculture and Irrigation	<a href="#">pdf</a> (1788K)	--	--
2	Community-Based Natural Resource Management (CBNRM)	<a href="#">pdf</a> (1386K)	--	<a href="#">html</a>
3	Construction	<a href="#">pdf</a> (889K)	--	<a href="#">html</a>
4	Ecotourism	<a href="#">pdf</a> (639K)	--	<a href="#">html</a>
5	Energy Sources for Development	<a href="#">pdf</a> (739K)	--	<a href="#">html</a>
6	Fisheries and Aquaculture	<a href="#">pdf</a> (904K)	--	--
7	Forestry: Including Forest Management, Plantations, and Agroforestry	<a href="#">pdf</a> (1043K)	--	--
8	Healthcare Waste: Generation, Handling, Treatment and Disposal	<a href="#">pdf</a> (1015K)	--	<a href="#">html</a>
9	Housing	<a href="#">pdf</a> (1701K)	--	--
10	Humanitarian Response Programs and the Environment	<a href="#">pdf</a> (858K)	--	--
11	Integrated Pest Management	<a href="#">pdf</a> (319K)	--	--
12	Livestock	<a href="#">pdf</a> (790K)	--	--
13	Rural Roads	<a href="#">pdf</a> (1770K)	--	<a href="#">html</a>
14	Safer Pesticide Use	<a href="#">pdf</a> (729K)	--	<a href="#">html</a>
15	Solid Waste	<a href="#">pdf</a> (867K)	--	--
16	Water Supply and Sanitation	<a href="#">pdf</a> (850K)	--	<a href="#">html</a>

### PART III - Guidelines for Micro and Small Enterprises (MSEs)

	Title	Download English Version	Download French Version	Resource List
1	Introduction - MSEs & the Environment	<a href="#">pdf</a> (344K)	--	--
2	Mechanisms for MSEs to Control Environmental Impact	<a href="#">pdf</a> (320K)	--	--
3	Institutionalizing Environmental Capacity	<a href="#">pdf</a> (675K)	--	--

4	Sub-Sector Specific CP Briefings	<a href="#">pdf</a> (1531K)	--	--
4.1	Brick & Tile Production	<a href="#">pdf</a> (493K)	--	<a href="#">html</a>
4.2	Food Processing	<a href="#">pdf</a> (518K)	--	<a href="#">html</a>
4.3	Leather Processing	<a href="#">pdf</a> (483K)	--	<a href="#">html</a>
4.4	Metal Finishing	<a href="#">pdf</a> (322K)	--	--
4.5	Small-Scale Mining	<a href="#">pdf</a> (509K)	--	<a href="#">html</a>
4.6	Wet Textile Operations	<a href="#">pdf</a> (500K)	--	<a href="#">html</a>
4.7	Wood Processing and Furniture Making	<a href="#">pdf</a> (291K)	--	--
5	Annexes	<a href="#">pdf</a> (472K)	--	--

## ***Pesticides***

This examination does not cover pesticides, including their procurement, use, transport, storage or disposal. Any pesticide activity considered under this program would necessitate the preparation of a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP), in accordance with AFR Bureau guidance and fulfilling all analytical elements required by 22CFR216.3(b), USAID's Pesticide Procedures.

OR

**Except as provided below, this IEE does not cover the procurement of pesticides.** Activities that entail the promotion or use of pesticides for activities involving controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas (< 4 ha) and carefully monitored, shall be within the parameters of 22 CFR 216.3(b)(2)(iii) ((Exceptions to Pesticide Procedures). All activities that fall outside of the category of controlled experimentation exclusively for the purpose of research and field evaluation under 22 CFR 216.2(c )(2)(ii) and entail the procurement or use, or both, of pesticides shall be analyzed in accordance with USAID Pesticide Procedures (22 CFR 216.3(b) and no funds shall be obligated or expended for the procurement or use of pesticides unless they are specifically approved through an amendment to this IEE in accordance with 22 CFR 216.3(b).

OR...

**Apart from those activities qualifying for exception to the Pesticide Procedures, as provided below, this IEE does not cover the procurement, use, transport, storage or disposal of pesticides.** Activities involving pesticides in controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas (< 4 ha) and carefully monitored, shall be within the parameters of 22 CFR 216.3(b)(2)(iii) (Exceptions to Pesticide Procedures). In such cases, the following conditions apply, per the requirements of 22 CFR 216.3(b)(2)(iii):

- the manufacturers of the pesticides must 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;
- treated crops will not be used for human or animal consumption unless appropriate tolerances have been established by EPA or recommended by FAO/WHO;
- 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.)

All activities that fall outside of the category of controlled experimentation exclusively for the purpose of research and field evaluation and entail the procurement or use, or both, of pesticides shall be analyzed in accordance with USAID Pesticide Procedures (22 CFR 216.3(b)) and no funds shall be obligated or expended for the procurement or use of pesticides unless they are specifically approved through an amendment to this IEE in accordance with 22 CFR 216.3(b).

OR...

Activities that entail the promotion or use of pesticides for activities involving controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas (< 4 ha) and carefully monitored, shall be within the parameters of 22 CFR 216.3(b)(2)(iii) ((Exceptions to Pesticide Procedures). In such cases, certain conditions specified in 22 CFR 216.3(b)(2)(iii) must be respected, as outlined in Section 3.4. All activities that fall outside of the category of controlled experimentation exclusively for the purpose of research and field evaluation under 22 CFR 216.2(c)(2)(ii) and entail the procurement or use, or both, of pesticides shall be analyzed in accordance with USAID Pesticide Procedures (22 CFR 216.3(b) and no funds shall be obligated or expended for the procurement or use of pesticides unless they are specifically approved through an amendment to this IEE in accordance with 22 CFR 216.3(b). Any new activity that involves pesticides, including their procurement, use, transport, storage or disposal would necessitate the preparation of a **consolidated** Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP), in accordance with AFR Bureau guidance and fulfilling all analytical elements required by 22CFR216.3(b), USAID's Pesticide Procedures. This mechanism will assist in identifying Integrated Pest Management (IPM) opportunities.

*[For programs involving support for insecticide-treated nets...]*

If the program will include support for the acquisition, distribution or marketing of insecticide treated bednets (ITNs), the [Health] Team and partner organizations will be required to use WHO-approved brands of long-lasting treated nets and adhere to all relevant stipulations made in the USAID Africa Bureau [Programmatic Environmental Assessment for Insecticide-Treated Materials in USAID Activities in Sub-Saharan Africa](#) (ITM PEA). If a need for net treatment or re-treatment arises, the Team will draft and gain approval for a "Pesticide Evaluation Report and Safer Use Action Plan" (PERSUAP) for the ITN program.

## **Fertilizers**

Although 22 CFR 216 does not specifically discuss fertilizers and potential impacts, we recommend SO Teams apply safeguards, and use the following language in the IEE:

...Only fertilizers that are approved by both the [local regulatory authority, e.g. Ugandan Crop Chemicals Board] and the **USEPA** can be introduced and utilized. Further, because of the environmental risks inherent in improper handling, storage, use and application, implementing partners must assure that potential users are trained in proper handling, storage, use and application techniques.

**...Agricultural Chemicals (IR 4.1):** For introduction and dissemination of other agricultural chemicals such as fertilizers (not including pesticides) training should be provided in product knowledge. Program activities will use **best management practices for soil fertility and health, as described below:**

- Integrated Soil Fertility Management (ISFM) – the use of both organic and inorganic sources of nutrients rather than either alone;
- The use of legume cover crops (plus phosphorous) and green manures by fallow rotation or intercropping;
- Agroforestry practices – in addition to soil conservation and production benefits, agroforestry transfers/cycles nutrients from within the soil profile (deeper levels to surface);
- The use of conservation tillage rather than deep plowing (although conservation tillage can be harmful for production systems in certain regions <sup>2</sup>);
- Use farm site manures and household wastes, with or without composting;
- Choose crops and associated plants that have high nutrient use efficiency.

**... Fertilizers and USAID Environmental Procedures (22 CFR 216) –**

Fertilizers are frequently lumped together with pesticides under the generic heading of "agro- or agrichemicals." From an environmental compliance perspective (22 CFR 216), as well as from a field-level implementation point of view, this is inappropriate, because it implies that fertilizers require the same level of scrutiny reserved for pesticides. Whereas pesticides are subject to clearly defined environmental review procedures, and an approval process to promote safer use and integrated pest management, such procedures do not apply to fertilizers (procurement procedures do apply to quantity bulk purchase). As with any technology, however, it is recommended that fertilizers be thoughtfully employed according to best practice, promoting integrated soil fertility management, within the context of the prevailing biophysical and

socio-economic conditions, as well as the desired outcomes. This fact sheet was developed to assist in that regard. [\(Link to fact sheet.\)](#)

## **Biotechnology, Biosafety, and GMOs**

Typical language for conditions to minimize potential effects of biotechnology, biosafety, and GMO/LMO activities:

This examination does not cover genetically-modified organisms (GMOs) or life-modified organisms (LMOs). Any support for laboratory- or field-based research, multiplication, or dissemination of GMOs or LMOs shall be subject to review under the Agency's Biosafety procedures.

OR..

A **Deferral** is recommended for technology development and dissemination involving genetically modified organisms (GMOs), pending further details on if, how and which transgenic materials may be addressed by the SO, and more details on the biotechnology component. Prior to irreversible commitment of funds to activities potentially involving GMOs in research, field trials or dissemination, the appropriate USAID Biosafety Procedures will be addressed (ADS 201.3.6.3b and draft ADS 211). Likewise, approval will be sought as appropriate (per (draft) ADS 211.3.1.3) from the cognizant national biosafety authority (e.g., KEPHIS).

OR

All USAID-funded interventions involving biotechnologies must be subjected to a USAID bio-safety review prior to implementation, under procedures applicable at that time. (Contact the USAID Bio-safety Officer for current guidance.)

OR

Biotechnology interventions to be carried out shall follow existing regulations and guidelines governing recombinant DNA research, testing and commercialization, and trans-boundary movement of GMOs as outlined in the *National Institute of Health (NIH) Guidelines*. These guidelines, "NIH Guidelines For Research Involving Recombinant DNA Molecules (NIH Guidelines), April 2002" may be accessed at:

[http://www4.od.nih.gov/oba/rac/guidelines\\_02/NIH\\_Guidelines\\_Apr\\_02.htm](http://www4.od.nih.gov/oba/rac/guidelines_02/NIH_Guidelines_Apr_02.htm)

OR...

A Negative Determination with Conditions, pursuant to 22 CFR 216.3(a)(2)(iii), is recommended for activities involving the use, experimentation, promotion or distribution of genetically modified organisms (GMOs) and/or biotechnology products. The conditions are as follows:

- 1) the Mission shall ensure (e.g. through the inclusion of appropriate provisions in SO 5 implementation instruments (contracts, grants, cooperative agreements, etc. and sub-agreements issued under such instruments) that the criteria set forth in the "Biosafety Procedures for Genetic Engineering Research," which is included as Annex 1 to this IEE are followed. In particular this guidance details the required written approval procedures needed before transferring or releasing GMO or biotechnology products;
- 2) the Mission shall ensure (e.g. through the inclusion of appropriate provisions in SO 5 implementation instruments (contracts, grants, cooperative agreements, etc. and sub-agreements issued under such instruments) that all applicable national laws, regulations and guidelines governing recombinant DNA research, testing and commercialization, and the use, production or distribution, including in research, of GMOs or biotechnology products are followed, and no GMO and/or biotechnology testing or release of any kind, including planting, shall take in a host country until the authorized agency or department of the national government of such country have APPROVED, IN WRITING, IN ADVANCE, such testing or release based on national laws, regulations or guidelines governing GMO and/or biotechnology and biosafety;
- 3) the Mission shall ensure (e.g. through the inclusion of appropriate provisions in SO 5 implementation instruments (contracts, grants, cooperative agreements, etc.) and sub-agreements issued under such instruments) that the United States *National Institute of Health (NIH) Guidelines for Research Involving Recombinant DNA Molecules* guidelines are followed. These guidelines may be located at: <http://www4.od.nih.gov/oba/rac/guidelines/guidelines.html>.
- 4) the Mission shall ensure (e.g. through the inclusion of appropriate provisions in SO 5 implementation instruments (contracts, grants, cooperative agreements, etc.) and sub-agreements issued under such instruments) that all international

laws governing recombinant DNA research, testing and commercialization, and the use, production or distribution, including in research, of GMOs or biotechnology products are followed.

OR...

Conditions precedent to dissemination of GMO products:

- SO 5 will not support the transfer of bio-engineered materials intended for planting without the host government's explicit advanced informed consent (**indeed REDSO will promote such deliberative review processes**).

-SO 5 must assure that its grantees and contractors comply with national and international laws applicable to biotechnology research and testing.

- No biotechnology interventions of any kind are to begin until the host countries and regional institutions involved have drafted and approved a regulatory framework governing biotechnology and bio-safety;

-All USAID-funded interventions which involve biotechnologies are to be informed by the ADS 211 series governing "Bio-safety Procedures for Genetic Engineering Research". In particular this guidance details the required written approval procedures needed before transferring or releasing GE products to the field.

- Biotechnology interventions to be carried out will have to follow existing regulations and guidelines governing recombinant DNA research, testing and commercialization, and trans-boundary movement of GMOs as outlined in the *National Institute of Health (NIH) Guidelines*:

[http://www.od.nih.gov/oba/rac/guidelines\\_02/NIH\\_Guidelines\\_Apr\\_02.htm](http://www.od.nih.gov/oba/rac/guidelines_02/NIH_Guidelines_Apr_02.htm).

OR...

The **Africa Regional Agricultural Biotechnology Support activities** are recommended for a **Negative Determination**, per 22 CFR 216.3(a)(2)(iii), with the following **conditions**:

- 1) All USAID-funded interventions which involve biotechnologies are to be informed by the draft ADS 211 series governing "Biosafety Procedures for Genetic Engineering Research". In particular this guidance details the required written approval procedures needed before transferring or releasing GE products to the field.
- 2) Biotechnology interventions to be carried out at the institutional will have to follow existing host country national regulations and guidelines governing recombinant DNA research, testing and commercialization, and of GMOs as outlined in the *National Institute of Health (NIH) Guidelines*. These guidelines may be located at: [http://www.od.nih.gov/oba/rac/guidelines\\_02/NIH\\_Guidelines\\_Apr\\_02.htm](http://www.od.nih.gov/oba/rac/guidelines_02/NIH_Guidelines_Apr_02.htm).
- 3) No biotechnology testing or release of any kind are to take place within an assisted country until the host countries involved have made formal decisions to APPROVE such testing or release based on national guidelines or regulatory framework governing biotechnology and bio-safety;
- 4) SO 5 must assure that its grantees and contractors comply with national and international laws applicable to biotechnology research and testing.
- 5) SO 5 will not support the transfer of bio-engineered materials intended for planting without the host government's explicit advanced informed consent (indeed REDSO will promote such deliberative review processes).

OR...

The conditions (explained in Section 3 and listed in Section 4 of this IEE Amendment) are that:

- The program activities will be required to follow existing regulations and guidelines governing recombinant DNA research, testing and commercialization of products thereof, and trans-boundary movement of GMOs outlined in the *National Institute of Health (NIH) Guidelines*<sup>1</sup>, *Regulations and Guidelines for Bio-safety in Biotechnology for Kenya* of the National Bio-safety Committee and the USAID ADS 211-*Biosafety Procedures for Genetic Engineering Research* (Annex I)<sup>2</sup>.

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<sup>1</sup> U.S. NIH Guidelines: [http://www4.od.nih.gov/oba/rac/guidelines\\_02/NIH\\_Guidelines\\_Apr\\_02.htm](http://www4.od.nih.gov/oba/rac/guidelines_02/NIH_Guidelines_Apr_02.htm),

<sup>2</sup> ADS 211- Biosafety Procedures for Genetic Engineering Research.

- These guidelines require that field trials or any such release into the environment is not conducted until both Kenyan and USAID written approval is obtained.
- This will require the submission of a specific proposal for the activity to the Kenyan NBC and USAID bio-safety officer.
- Approval cannot be granted for the field release until the specific experiments are developed, and documentation is submitted to the Agency Bio-safety Committee, hence the needs to require this step at the later date, according to the procedures of ADS 211 (Annex I).

#### COMPLIANCE WITH THE NIH GUIDELINES FOR RESEARCH INVOLVING RECOMBINANT DNA MOLECULES

Release Date: May 28, 2002

Notice: NOT-OD-02-052

National Institutes of Health  
Office of Biotechnology Activities  
(<http://www4.od.nih.gov/oba/>)

#### **Compliance with the NIH Guidelines for Research Involving Recombinant DNA Molecules**

USAID programs will follow the guidance of the U.S. National Institutes of Health, Office of Biotechnology Activities (<http://www4.od.nih.gov/oba/>). Investigators and institutions supported by USAID must adhere to the NIH Guidelines for Research Involving Recombinant DNA Molecules (NIH Guidelines) when they perform research that is conducted at or sponsored by an entity receiving any USAID support for recombinant DNA research. Therefore, even privately funded projects employing recombinant DNA must adhere to the NIH Guidelines if they are being carried out at, or funded by, an organization that has any USAID contracts, grants, or other support for this kind of research. Adherence to the NIH Guidelines is mandatory and important because they stipulate biosafety and containment measures for recombinant DNA research. Furthermore, they delineate critical ethical principles and outline key safety reporting requirements for human gene transfer research. A fully indexed, hyperlinked copy of the NIH Guidelines can be viewed on line or downloaded at: <http://www4.od.nih.gov/oba/rac/guidelines/guidelines.html>.

#### **Livestock transgenic products, vaccines**

Likewise, technology development and dissemination involving genetically modified vaccines should be subject to the appropriate USAID and host country review procedures. Prior to irreversible commitment of funds to activities potentially involving GMOs in research, field trials or dissemination, the appropriate USAID Biosafety Procedures will be addressed. Likewise, approval will be sought as appropriate from the cognizant national biosafety authority.

#### ***Seeds, Germplasm, Exotic Species***

**x.x. Seed supply. A Negative Determination with Conditions** is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for activities associated with seeds, seed supply and planting materials (IR 8.1).

**Conditions:** Suppliers shall: 1) ensure appropriateness for the agroclimatic zone to which they are being introduced; 2) avoid introducing exotic invasive species; and 3) avoid providing or promoting genetically modified organisms (GMOs). This requires identifying and mitigating any potential direct adverse impacts on the physical environment and human health and safety (such as due to aflatoxin contamination) arising from distribution of free seeds.

**Condition:** non-native plants will not be introduced into protected areas.

## Foreign Assistance Act, Part I, Section 119 - Endangered Species

Sect. 119 (g) Actions by AID.--The Administrator of the Agency for International Development shall-

(10) deny any direct or indirect assistance under this chapter for actions which significantly degrade national parks or similar protected areas or introduce *exotic plants or animals* into such areas.

## Small-scale Construction

Potential adverse impacts from small scale construction activities can be summarized as follows:

*The details of the construction carried out in support of any particular development activity or site will have a number of unique aspects. Construction activities in general, however, share a set of common features and potential adverse environmental impacts.*

### *Potential Adverse Impacts of Construction Projects*

- *Damage to ecosystems*
- *Sedimentation of streams and surface water*
- *Contamination of water supplies*
- *Social impacts*
- *Spread of disease*
- *Damage to aesthetics of area*

EGSSAA [Chapter 3: Small-Scale Construction](#)

Example:

*Small scale construction conditions [version of 22 April 2004]*

These example conditions should be revised, as necessary, based on project-specific information on the proposed construction activities:

- All construction activities shall be conducted following principles for environmentally sound construction, as provided in [Chapter 3: Small Scale Construction](#) of the USAID Environmental Guidelines for Small-scale Activities in Africa, which can be found at [www.encapafrika.org](http://www.encapafrika.org).
- For the rehabilitation of existing facilities, and for construction of facilities in which the total surface area disturbed is less than 10,000 square feet, the condition is that these activities shall be conducted following principles for environmentally sound construction, as provided in the Small Scale Construction chapter of the USAID Environmental Guidelines for Small-scale Activities in Africa, which can be found at: [www.encapafrika.org](http://www.encapafrika.org).
- For the construction of any facilities in which the total surface area disturbed exceeds 10,000 square feet (1,000 square meters), the program shall conduct a supplemental environmental review according to guidance in Annex G of the Africa Bureau Environmental Procedures Training Manual (EPTM). Construction will not begin until such a review is completed and approved by the Mission Environmental Officer.

## Roads

**Negative Determinations with Conditions are recommended**, per 22 CFR 216.3(a)(2)(iii) for the following ...activities:

**Re-opening and maintenance of existing roads** (IR 1.1) No new road construction is planned. Existing tertiary and secondary roads will be repaired using established best practices as reflected in Chapter 14 on Rural Roads in USAID/AFR *Environmental Guidelines for Small Scale Activities in Africa* (EGSSAA) located at: (<http://www.encapafrika.org/SmallScaleGuidelines.htm>). Also useful guidance for road construction, maintenance and rehabilitation are guidelines given in *Low-Volume Roads Engineering: Best Management Practices Field Guide*, by Gordon Keller and James Sherar, by the US Forest Service for USAID and in collaboration with USDA. (July 2003) (see same ENCAP website, or <http://www.fs.fed.us/global>, or <http://www.zietlow.com/>). Further, a *certified roads engineer* will be employed to oversee activities and report to the MEO/USAID as necessary.

## **Water and Sanitation**

### *Potential environmental impacts:*

The human health benefits of water and sanitation activities are enormous, and generally far outweigh any potential negative impacts of such activities. Still, the potential for adverse environmental impacts from water and sanitation activities exists, and it is the responsibility of program designers and implementers to avoid such impacts to the extent possible. Potential adverse impacts from water and sanitation activities can be summarized as follows:

#### *Potential adverse impacts from water supply activities:*

- 1. Depletion of fresh water resources (surface and groundwater)*
- 2. Chemical degradation of the quality of potable water sources (surface and groundwater)*
- 3. Creation of stagnant (standing) water*
- 4. Degradation of terrestrial, aquatic, and coastal habitats*
- 5. Increased human health risks (e.g. from arsenic content in groundwater)*

#### *Potential adverse impacts from sanitation activities:*

- 1. Increased human health risks from contamination of surface water, groundwater, soil, and food by excreta, chemicals and pathogens*
- 2. Ecological harm from degradation of stream, lake, estuarine and marine water quality and degradation of land habitats*

EGSSAA [Chapter 16: Water Supply and Sanitation](#)

### *Water and Sanitation conditions:*

Both water supply and sanitation activities should be conducted in a manner consistent with the good design and implementation practices described in EGSSAA [Chapter 16: Water Supply and Sanitation](#). The SO Team and implementing partners should closely examine this chapter, as it provides a thorough discussion of program design and implementation issues that can help avoid numerous preventable problems. Another useful reference to consult for good water and sanitation design and implementation principles is the document, “Guidelines for the Development of Small Scale Rural Water Supply and Sanitation Projects in Ethiopia,” by Catholic Relief Services and USAID, July 31, 2003.

Water quality testing is essential for determining that the water from a constructed water source is safe to drink and to determine a baseline so that any future degradation can be detected. Among the water quality tests which must be performed are tests for the presence of arsenic. Any USAID-supported activity engaged in the provision of potable water must adhere to Guidance Cable State 98 108651, which requires arsenic testing. That 1998 cable also anticipates “practical guidelines on sampling and testing for arsenic” that were then under development. The EGAT Bureau completed these guidelines, and the Africa Bureau has packaged them in a document titled, [“Guidelines for Determining the Arsenic Content of Ground Water in USAID-Sponsored Well Programs in Sub-Saharan Africa.”](#) The SO team must assure that the standards and testing procedures described in this guideline document are followed for potable water supply activities under this program.

## **Medical Waste**

### *Potential impacts*

Although small-scale healthcare activities provide many important benefits to communities, they can also unintentionally do great harm through poor design and management of waste management systems. Healthcare waste is dangerous. If handled, treated, disposed of incorrectly it can spread disease, poisoning people, livestock, wild animals, plants and whole ecosystems.

Currently, little or no management of healthcare wastes typically occurs in small-scale facilities in Africa. Training and supplies are minimal. Common practice in urban areas is to dispose of healthcare waste along with the general solid waste or, in peri-urban and rural areas, to bury waste, without treatment, in an unlined pit. In some cities small hospitals may incinerate waste in dedicated on-site incinerators, but often they fail to operate them properly. Unwanted pharmaceuticals and chemicals may be dumped into the local sanitation outlet, be it a sewage system, septic tank or latrine.

### *Conditions*

For [identify affected activities – involving the potential for generation of medical waste], the SO team must work with its implementing partners to assure, to the extent possible, that the medical facilities and operations involved have adequate procedures and capacities in place to properly handle, label, treat, store, transport and properly dispose of blood, sharps and other medical waste. The ability of the Team to assure such procedures and capacity is understood to be limited by its level of control over the management of the facilities and operations that USAID/[country] is supporting.

The USAID Bureau for Africa’s Environmental Guidelines for Small Scale Activities in Africa (EGSSAA) Chapter 8, “[Healthcare Waste: Generation, Handling, Treatment and Disposal](#)” (found at this URL: <http://encapafrika.org/SmallScaleGuidelines.htm>) contains guidance which should inform the Team’s activities to promote proper handling and disposal of medical waste, particularly in the section titled, “Minimum elements of a complete waste management program.” The program is also encouraged to make use of the attached “Minimal Program Checklist and Action Plan” for handling healthcare waste, which was adapted from the above EGSSAA chapter and which should be further adapted for use in USAID/[country] programs.

Other important references to consult in establishing a waste management program are “WHO’s Safe Management of Wastes from Healthcare Activities” [http://www.who.int/water\\_sanitation\\_health/medicalwaste/wastemanag/en/](http://www.who.int/water_sanitation_health/medicalwaste/wastemanag/en/) and the State Department cable “1993 State 264038: Model Guidance on Health Projects Involving HIV Screening and Handling of Blood.” Additional guidance is also available via the reference section of the above EGSSAA chapter.

## ***Livestock production***

### *Potential impacts*

Properly managed, livestock production can enhance land and water quality, biodiversity, and social and economic well-being. However, when improperly managed, livestock production may cause significant economic, social and environmental damage. As described in the [Livestock Production chapter](#) of the EGSSAA, following are the types of environmental problems often associated with livestock production:

- Land degradation;
- Habitat damage and reduced biodiversity;
- Harm to vegetation.

Livestock product processing can also have negative impacts on the environment. Leather processing, for example, is a particularly problematic activity associated with livestock production, as described in EGSSAA “[Chapter 4.3 Leather Processing: Cleaner Production Fact Sheet and Resource Guide](#).” Environmental problems commonly associated with leather processing include the introduction of toxic chemicals into the environment through the waste stream, use of large quantities of water, worker health hazards, odor, and overproduction and inappropriate management of waste.

### *Conditions*

For increased livestock production and processing a **Negative Determination** is recommended per 22 CFR 216.3 (a)(2)(iii) **with conditions** that include:

The SO team shall work with implementing partners to assure that the livestock production activities are designed and implemented in such a way as to avoid potential harmful impacts as much as possible. The above EGSSAA chapters and the Livestock chapter’s table titled, *Mitigation and Monitoring Issues Environmental Mitigation and Monitoring Issues for Livestock Projects* shall be used as guides in the design. Implementing partners should monitor for and report on adverse impacts, particularly land and habitat degradation.

## ***Research or studies with human subjects and/or animals***

To the extent this involves carefully controlled research, activities may pose risk factors with respect to human and animal subjects, the following conditions shall apply:

- Any issues concerning human research subjects will follow NIH requirements in consultation with CDC advisors. Procedures shall be consistent with U.S. National Institutes for Health (NIH) guidelines for research involving human subjects. (45 CFR Part 45. Protection of Human Subjects. See the URL: <http://ohrp.osophs.dhhs.gov/humansubjects/guidance/45cfr46.htm>)
- Activities shall follow U.S. National Institutes for Health (NIH) guidelines for research involving live animals. The use of animals in research is a privilege that carries with it the responsibilities of proper care and humane treatment of animals. To biomedical scientists, proper care is in the best interest of the laboratory animals and is essential to ensure quality research. (Consider Public Law 99-158:Animals in Research: <http://grants.nih.gov/grants/olaw/references/hrea1985.htm>.)

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## Environmental Screening

[NOTE: include alternative of Environmental Review Report (ERR) format, as now in the EGSSAA Part III ([www.encapafrika/SmallScaleGuidelines/](http://www.encapafrika/SmallScaleGuidelines/)). Use the most recently revised version of the , which WIK revised in April 2004...] – How to deal with this, link to where?

[Adapted from \_\_ 34Sudan1\_SO8\_ Econ\_Recovery.doc]

### 4.2.2 Subawards, sub-grants, Small Grants Programs (IR 8.2, IR8.3)

A **Negative Determination with Conditions** is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for sub-grants and small grants programs (IR 8.2, 8.3) involving support for activities with the potential for impact on the environment, i.e. those that would not qualify for Categorical Exclusion pursuant to 22CFR216.2(c)(2)(1)(i). The SOT, together with the MEO, is responsible for determining whether the activities intended for support warrant an environmental screening process.

**Condition:** In the event that sub-grants and small grants will support activities with the potential for impact on the environment, the Sudan Field Office Team has the responsibility for assuring that an environmental screening process is introduced, as follows:

#### Environmental Screening Process (if required)

- Implementing partners will screen proposed activities according to *the Africa Bureau Screening and Environmental Review Process*, which is described in the Bureau’s Environmental Procedures Training Manual, “[Annex G: Umbrella IEEs and Subgrant Environmental Screening](#),” as well as in the Africa Bureau *Environmental Guidelines*, Part III. Both can be found at <http://www.encapafrika.org/Resources.htm>). As described there, the screening categories include the following: **Category 1 (very low risk)**. Activities that would normally qualify for a categorical exclusion under Reg. 216; **Category 2 (medium risk)**. Activities that would normally qualify for a negative determination under Reg. 216; **Category 3 (high risk)**. Activities that have a clear potential for undesirable environmental impacts and typically under Reg. 216 require an Environmental Assessment; **Category 4 (very high risk)**. Activities that either USAID cannot fund or for which specific findings must be made in an Environmental Assessment prior to funding.

The MEO shall be responsible, first, for clearing the implementing partner’s category determination. Further, the MEO must approve all Category 2 Environmental Reviews individually or in groups. . All Category 3 Environmental Reviews must be approved by the BEO. Any activities that fall within Category 4 will be immediately referred to the REO and BEO, unless the MEO rejects them and thereby denies implementation of the subject activities.

- The implementing partners will take into consideration potential environmental impacts and their mitigation and monitoring measures, including avoidance during the design process to achieve an environmentally-sound project design and for program sustainability.
- Implementing partners will take into account the Africa Bureau [Environmental Guidelines for Small-Scale Activities in Africa](#) and other appropriate Africa Bureau and generic environmental assessment sources, to assist in determining what potential projects impacts should be of concern for different types of development activities in various settings, and which impacts to mitigate and monitor for a particular development activity.
- Implementing partners must identify in the environmental review reports all proposed environmental mitigation and monitoring requirements. Once the environmental review reports are approved, mitigation measures and monitoring procedures stated in the environmental review report should be considered as a requirement. Additionally, project implementers should ensure that the agreed-upon mitigation and monitoring measures are in place.
- Sudan Field Office Team shall report on an annual basis on the status of environmental screening and review, and the implementation of required mitigation and monitoring measures. This will include the review of implementing partners' progress and annual reports to help determine if environmental mitigation and monitoring procedures are in place, including their expected performance, and periodic field visits by the SREO and REOs.

Given that [the nature of the activities is not well know] [details about the proposed activities are not yet fully developed, e.g. siting], the grantee or sub-grantee will be required to subject [the referenced activities] to an environmental screening process intended to identify potential environmental problems, appropriate mitigation measures, and to trigger supplemental environmental review if appropriate. The SO team has the responsibility to ensure that the environmental screening and review process is applied in conformity with the procedures described below:

**Environmental Screening and Report Form (ESF/R)**

This form is to be utilized to screen USAID-funded activities, including grantees of the PVO umbrella projects, and proposals submitted for consideration for funding under other USAID programs including grants management units, where USAID has approved through an Initial Environmental Examination that this process be put in place. This is a *generic* form, illustrative only, and its final contents are to be refined and jointly determined among the affected partners - - NGO, USAID, host country agencies, etc. To the extent possible, the form should reflect host government environmental policies and procedures, e.g., accounting for existing designated protected areas.

Typically, two broad categories of projects will be funded: (a) those designed to strengthen local institutional capacities to manage the natural resource base and (b) those designed to support the development of appropriate infrastructure needed for sustainable natural resource management. Activities could include training, technical assistance and other institutional support, income-generating activities through the exploitation of natural resources in a self-sustaining and environmentally sound manner or development of physical infrastructure to further natural resource management at the district level. Under other components of USAID-funded programs, training, technical assistance, research, studies, and information-related activities and other types of activities can be funded.

*This form is intended to be adaptable to unique circumstances.* In using this form, adjustments as needed can be made in consultation with the Regional and Bureau Environmental Offices. The Mission Environmental Officer shall make on-site visits prior to finalization of the ESF, and the ESF shall be rational and fully defensible and without ambiguity as to how the conclusion was reached that the activity(ies) will have no significant impact.

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# Template for IEE and CE Requests

## ***Facesheet for IEE/CE Request***

Goes with either an IEE or a CE Request. See Separate Annotated IEE Outline and Annotated CE Request Outline below. Remove this heading text and adapt text in yellow.

**INITIAL ENVIRONMENTAL EXAMINATION  
AND/OR  
REQUEST FOR CATEGORICAL EXCLUSION**

**PROGRAM/ACTIVITY DATA:**

**Program/Activity Number:** ( \_\_\_\_\_ - \_\_\_\_\_ )

**Country/Region:** \_\_\_\_\_

**Program/Activity Title:** \_\_\_\_\_

**Funding Begin:** \_\_\_\_\_ **Funding End:** \_\_\_\_\_ **LOP Amount:** \$ \_\_\_\_\_  
**Sub-Activity Amount:** \$ \_\_\_\_\_

**IEE Prepared By:** \_\_\_\_\_ **Current Date:** \_\_\_\_\_

**IEE Amendment (Y/N):** \_\_\_\_\_ If "yes", Filename & date of original IEE \_\_\_\_\_ ; \_\_\_\_\_

**ENVIRONMENTAL ACTION RECOMMENDED:** (Place X where applicable)

Categorical Exclusion: \_\_\_\_\_ Negative Determination: \_\_\_\_\_  
Positive Determination: \_\_\_\_\_ Deferral: \_\_\_\_\_

**ADDITIONAL ELEMENTS:** (Place X where applicable)

CONDITIONS \_\_\_\_\_ PVO/NGO: \_\_\_\_\_

**SUMMARY OF FINDINGS:** (please limit to this page whenever possible, but at most three pages without clearances)

**APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:** (Type name under signature line)

**CLEARANCE:**

Mission Director: \_\_\_\_\_ Date: \_\_\_\_\_

**CONCURRENCE:**

Bureau Environmental Officer: \_\_\_\_\_ Date: \_\_\_\_\_

Paul des Rosiers (Acting) Approved: \_\_\_\_\_

Disapproved: \_\_\_\_\_

**Filename:** \_\_\_\_\_ (USAID/AFR BEO)

**ADDITIONAL CLEARANCES:** (Add as appropriate; type name under signature line)

Mission Environmental Officer: \_\_\_\_\_ Date: \_\_\_\_\_

Activity Manager: \_\_\_\_\_ Date: \_\_\_\_\_  
(Cognizant Technical Officer, etc.)

SO Team Leader: \_\_\_\_\_ Date: \_\_\_\_\_

Regional Environmental Officer  
(RCSA, REDSO, WARP): \_\_\_\_\_ Date: \_\_\_\_\_  
Rob Clausen, Walter Knausenberger or Jean Saint-Cyr

Environmental Analyst &  
Policy Advisor (AFR/SD): \_\_\_\_\_ Date: \_\_\_\_\_  
Brian Hirsch

**OPTIONAL CLEARANCES:**

General Counsel  
(Africa Bureau): \_\_\_\_\_ Date: \_\_\_\_\_

Regional Legal Advisor: \_\_\_\_\_ Date: \_\_\_\_\_

## **Annotated IEE Outline**

Attach facesheet above, remove this heading and adapt text in yellow

### **INITIAL ENVIRONMENTAL EXAMINATION**

#### **PROGRAM/ACTIVITY DATA:**

[For Title II DRP IEEs]

DRP Program/Activity:

CS Name, Country/Region:

[For non-Title II IEEs]

Program/Activity Number:

Country/Region:

Program/Activity Title:

#### **1.0 BACKGROUND AND ACTIVITY/PROGRAM DESCRIPTION**

##### **1.1 Purpose and Scope of IEE**

What does the IEE cover, why is it needed, is it an amendment, and if so, why? What other IEEs cover the sector, or SO, if any?

##### **1.2 Background**

Describe why the activity is desired and appropriate, with some relevant context.

##### **1.3 Description of Activities**

Outline the key activities proposed for funding. A current activity description should be provided, paraphrasing and shortening as much as needed. Some suggested subheadings:

###### **1.2.1 Results Framework**

###### **1.2.2 SO... Activities Results Framework**

#### **2.0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)**

Recommended subheadings:

##### **2.1 Locations Affected**

##### **2.2 National [or applicable] Environmental Policies and Procedures [of host country both for environmental assessment and pertaining to the sector]**

This section is critical and should briefly assess the current physical environment that might be affected by the activity. It should draw on the Country Strategy and supportive analysis (such as the Environmental Threats and Opportunities Assessment, Conflict Vulnerability Assessment, etc.). While we are seeking to streamline IEEs, we also need to try to maintain the integrity of relevant analysis that sheds light on the interventions in the SO. This may be a standard we cannot always meet.

Our objective should be to add analysis which has a bearing upon the substance of the sector involved, we don't want irrelevant "fill" material in here. Ideally some thoughtful analysis should be there, or at least compact, up-to-date, relevant info to the sector, e.g., on the environment-conflict links. It is worth drawing attention, in the IEE (which seeks to ensure that we avoid harm, in the most basic biophysical sense), to the SO's opportunities for improving environmental management and governance.

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. Not all IEEs need to discuss all these topics.

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.

*Cross-referencing.* One approach which might be an appropriate expedient is to refer to an earlier IEE's write-up for this Section, as long as it is in the same strategy period, and reasonably recent and relevant (say, less than 3-5 years old). If one were to use this approach, here's how it should be done (the file can be found online: "See IEE for SO1 -- Increased rule of law and transparency in governance, 27rwand4.ief, at <http://www.afr-sd.org/documents/ief/docs/27rwand4.doc>.)

The [BEO Actions Tracker](#) is a reliable resource for IEE language, typically kept current within at least six months.

### **3.0 EVALUATION OF PROJECT/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 THRESHOLD DECISIONS & MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)**

- 4.1 Recommended Threshold Decisions and Conditions**
- 4.2 Mitigation, Monitoring and Evaluation**

***FOR UMBRELLA IEE, THE FOLLOWING MIGHT BE USED:***

- 4.1 Recommended Threshold Decisions and Conditions**
- 4.2 Recommended Planning Approach**
- 4.3 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**

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 (see examples above).

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 (see examples above).

## **Annotated Outline for Requests for Categorical Exclusion**

Attach facesheet above, remove this heading and adapt text in yellow.

*[alternative format if requesting only a Categorical Exclusion, no extensive narrative needed, normally need not exceed 1-2 pages, outlining the program elements, total 3-5 pages, including the Face Sheet]*

### **Annex 1**

#### **[JUSTIFICATION] REQUEST FOR CATEGORICAL EXCLUSION**

##### **SO # & program / activity title**

#### **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)...

Here is an example:

The items described justify Categorical Exclusions, pursuant to 22 CFR §216.2(c)(1) and (2), for which an Initial Environmental Examination, or an Environmental Assessment are not required because the actions do not have an effect on the natural or physical environment.

SO 8 interventions, as currently planned, fall into the following classes of action:

- (a) education, technical assistance and training (216.2(c)(2)(i));
  - (b) analyses, studies, and workshops (216.2(c)(2)(iii));
  - (c) document and information transfer (216.2(c)(2)(v)); and
  - (d) activities that will develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)).
- As currently planned, no interventions will directly affect the environment.

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If during implementation, activities are considered under SO 8 that are outside the above framework, activities other than those described in the subject categorical exclusions, and that may directly affect the environment (such as construction or rehabilitation of facilities), an IEE or amended Request for a Categorical Exclusion shall be submitted, as appropriate.

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## Streamlined IEE Formats: Experimenting

May 20, 2004

Some experimentation is underway with streamlining preparation and review of Reg. 216 documentation.

1. Some preparers contend that Section 2 does not add sufficiently to the IEEs' substance (very rarely do they achieve "baseline info" quality), so why not curtail or drop it unless there is a persuasive reason to include details? But see the annotations to Section 2 in the [Annotated Template](#) above.
2. Further, some believe that it is feasible to combine all analysis of impacts, mitigation conditions and threshold determinations in one place, a new section 2 or 3, or "the Table."
3. Length: Keep entire length to max. 15 pages (but not to be slavish about this).
4. Agreement was reached on May 11, 2004 that GC will no longer need to receive IEEs for review routinely, but only when special or new issues arise, or Positive Determinations are involved.

So, by ...

- Streamlining Sect. 1 to only essentials to characterize the program, down to at IR level.
- curtailing Sect. 2, to cover essentials for sector only, with some info on relevant host country procedures and regulatory system, application of environmental laws.
- combining Sect. 3-4, and
- dropping Sect. 5, the Summary...
- summarizing the essential decisions and conditions in the Summary of Findings,
- hyperlinking to EGSSAA resources (mainly, but not only),
- otherwise eliminating anything unnecessarily repeated,
- tightening up the threshold determination language using (an ever-enhanced) RALF, and
- making resources available on Africa Bureau EOKX,

...the process of preparing IEE can be significantly simplified and streamlined.

## Acceptable Table Formats for Presenting Threshold Decisions and Mitigation Conditions

- A single Table, not several short ones close together
- Landscape or Portrait format, in narrative body or as Annex.
- Table header rows repeated automatically at top of each page (Table Properties, Row, check box)

### ANNEX 1:

**Summary Of Threshold Decisions, by IR, for Sudan SO 8: Foundation Established For Economic Recovery. Refer to Section 4 for Expanded mitigation and monitoring measures by key issue area.**

Program/Activities	Impact Issues & conditions, mitigation or proactive interventions	Recommended Threshold Determination & 22 CFR Part 216 (Reg. 216) citation
<b>SO8: Foundation Established for Economic Recovery.</b>		
<p><b>Intermediate Result 8.1: Food security needs of vulnerable communities met.</b></p> <p>a) The activities for: (1) Food aid distributions; supplementary feeding; training of agricultural extension workers and community animal health workers; and providing support for disaster early warning systems.</p> <p>b) Rehabilitation of roads, except where this is exempted as per 22 CFR 216.2 (b) (1) ;</p> <p>Distributions of improved seeds; establishment of community food stores and seed banks; and, encouragement of change in crop production choices and cultivation techniques.</p>	<p>a) Will not have a direct effect on the environment.</p> <p>b) See Sect. 3.2.1 and Section 4.2.1 regarding a PEA, and the discussion under IR 8.3 below.</p> <p>As apt, activities will be subjected to a screening process to identify appropriate adverse impact mitigation and monitoring measures.</p>	<p>a) Categorical Exclusion 22 CFR 216.2 (c)(2)(i), education, technical assistance or training; 216.2 (c)(2)(iii): analyses, studies, academic or research workshops and meetings; 216.2 (c)(2)(v): document and information transfers; and, 216.2 (c)(2)(viii) for programs involving nutrition, health care or population and family planning services.</p> <p>b) Positive Determination, per 22 CFR 216.2(d)(viii) for road improvement. OFDA funded activities would not be directly implicated.</p> <p>Negative Determination with Conditions, 22 CFR 216.3 (a)(2)(iii). See Section 4.1 for details on ND with conditions regarding seed supply. Conditions: Application of appropriate guidelines as in <a href="http://www.encapafrika.org/SmallScaleGuidelines.htm">http://www.encapafrika.org/SmallScaleGuidelines.htm</a>.</p>
<p><b>IR 8.2: Market support institutions created and strengthened.</b></p> <p>Technical assistance, training workshops, meetings, market research, information documentation and analysis, exchange of skills</p>	<p>Will not have a direct effect on the environment.</p>	<p>Categorical Exclusion, 22 CFR 216.2 (c)(2)(i), education, technical assistance or training; 216.2(c)(2)(ii): research and experimentation; 216.2 (c)(2)(iii): analyses, studies, academic</p>

Program/Activities	Impact Issues & conditions, mitigation or proactive interventions	Recommended Threshold Determination & 22 CFR Part 216 (Reg. 216) citation
<p>and market information; equipment supply, commodities, and, establishment of links and networks</p> <p>Rehabilitation and development of buildings involving constructions, water and sanitation facilities and establishment of agribusiness training centers. Provision of sub-grants</p>	<p>See Sect. 3.2.1 and Section 4.2.1 regarding a PEA, and the discussion under IR 8.3 below.</p> <p>Conditions: Application of appropriate guidelines as in <a href="http://www.encapafrica.org/SmallScaleGuidelines.htm">http://www.encapafrica.org/SmallScaleGuidelines.htm</a>.</p> <p>As apt, activities will be subjected to a screening process to identify appropriate adverse impact mitigation and monitoring measures.</p>	<p>or research workshops and meetings; 216.2 (c)(2)(v): document and information transfers.</p> <p>Negative Determination with Conditions, 22 CFR 216.3 (a)(2)(iii)</p>
<p><b>IR 8.3 : Market support programs and services Introduced and expanded.</b></p> <p>a. Technical assistance, training workshops; equipment supply, commodities, establishment of links and networks; and; information documentation, analysis and transfer.</p> <p>b. Rehabilitation of roads in southern Sudan under SIP and WFP/GTZ programs, and associated culverts, bridges, etc.</p> <p>c. Rehabilitation of dikes in North and South Bor, and associated water management infrastructure, incl. pilot drainage- and irrigation works.</p> <p>d. Rehabilitation and development of buildings and minor roads and other key infrastructure (telephone and power supply networks), building constructions and, water and sanitation facilities for agribusiness training centers.</p>	<p>a. No impacts expected; commodities will have no biophysical actions on the environment</p> <p>b. A programmatic or sectoral EA approach is recommended. See Section 4.2.1.</p> <p>c. An Environmental Assessment on the suite of actions planned is recommended. See Sect. 4.2.1.</p> <p>d. These activities must follow established environmental guidelines, or be subjected to a screening process to identify appropriate adverse impact mitigation and monitoring measures.</p> <p>e. An appropriate screening process to be</p>	<p>a. Categorical Exclusion, 22 CFR 216.2 (c)(2)(i), education, technical assistance or training; 216.2 (c)(2)(iii): analyses, studies, academic or research workshops and meetings; 216.2 (c)(2)(v): document and information transfers.</p> <p>b. A <b>Positive Determination</b> is recommended per 22 CFR 216.2(d)(viii) and 22 CFR 216.3 (a)(2)(iii), for road improvement. Specifically, a <b>Programmatic (or sectoral) Environmental Assessment (PEA) approach</b> is recommended, per 22 CFR 216.6(d).</p> <p>c. Positive Determination, per 22 CFR 216.2(d)(i) for river basin development, (ii) irrigation or water management; and (iv) drainage projects.</p> <p>d. Negative Determination with Conditions, per 22 CFR 216.3 (a)(2)(iii)</p> <p>e. Negative Determination with Conditions, per 22 CFR 216.3</p>

<b>Program/Activities</b>	<b>Impact Issues &amp; conditions, mitigation or proactive interventions</b>	<b>Recommended Threshold Determination &amp; 22 CFR Part 216 (Reg. 216) citation</b>
e. Provision of a subgrants, loan fund for microfinance institutions; and technical assistance and sub-grants for HIV/AIDS programs	designed to identify appropriate adverse impact mitigation and monitoring measures.	(a)(2)(iii)
<p><b>IR 8.4: Transparent policymaking processes encouraged.</b></p> <p>Technical assistance, training workshops; meetings, making policies, regulations and laws affecting ownership and utilization of natural resources, agricultural production and marketing, enterprise creation and profitability, and macroeconomic policy; funding and research and analysis in economic and natural resources policy.</p>	No potential for direct impact on the environment.	Categorical Exclusion, 22 CFR 216.2 (c)(2)(i), education, technical assistance or training; 216.2 (c)(2)(iii): analyses, studies, academic or research workshops and meetings; 216.2 (c)(2)(v): document and information transfers; and 216.2(c)(2)(xiv), for studies, projects or programs intended to develop the capability of recipient countries and organizations to engage in development planning.

**TABLE 1: SUMMARY OF RECOMMENDED THRESHOLD DETERMINATIONS FOR SUDAN  
SO 7: INCREASED USE OF HEALTH, WATER AND SANITATION SERVICES.**

Key Elements of Program/Activities	Threshold Determination & 22 CFR 216 Citation	Impact Issues & Mitigation Conditions and/or Proactive Interventions
<b>SO 7: Increased Use of Health, Water and Sanitation Services</b>		
<p><b>Intermediate Result 7.1: Increased access to high-impact services.</b></p> <p>Technical assistance, education and training workshops, meetings, information documentation, analysis and transfer for equipment supply, community-based health care, child survival; maternal and child health care; improved nutrition; and improvement drugs availability</p>	<p>Categorical Exclusion: 22 CFR 216.2 (c)(2)(i), education, technical assistance or training; 216.2 (c)(2)(iii): analyses, studies, academic or research workshops and meetings; 216.2 (c)(2)(v): document and information transfer; 216.2 (c)(2)(viii) for programs involving nutrition, health care or population and family planning services; and 216.2(c)(xiv) programs intended to develop capability of recipient countries to engage in development planning.</p>	<p>No biophysical interventions involved</p> <p>CE applies except to the extent that activities might directly affect the environment (such as construction of facilities, water supply systems, waste water treatment extent designed to include activities, etc.)</p>
<p><b>Intermediate Result 7.1: cont'd.</b></p> <p>To the extent they involve health care waste management: vaccinations; community-based health care, child survival; maternal and child health care</p>	<p>Negative Determination with Conditions 22 CFR 216.3 (a)(2)(iii)</p>	<p>For activities that will increase access to quality immunization services, the program must make reasonable efforts to assure development and implementation of an adequate medical waste management program. Consult EGSSA (<a href="http://www.encapafrika.org">www.encapafrika.org</a>) and utilize the Minimal Program Checklist (Annex A).</p> <p>(Further details re: medical waste management conditions are given following this table.)</p>
<p><b>Intermediate Result 7.1: cont'd.</b></p> <p>Construction of primary health centre units with FFW</p>	<p>Negative Determination with Conditions 22 CFR 216.3 (a)(2)(iii)</p>	<p>Team responsible for the construction and related activities is expected to apply the Africa Bureau <i>Environmental Guidelines for Small-scale Activities in Africa (EGSSAA)</i>. The URL is: (<a href="http://www.encapafrika.org/SmallScaleGuidelines.htm">http://www.encapafrika.org/SmallScaleGuidelines.htm</a>)</p> <p>(Further details re: small scale</p>

Key Elements of Program/Activities	Threshold Determination & 22 CFR 216 Citation	Impact Issues & Mitigation Conditions and/or Proactive Interventions
		construction conditions are given following this table.)
<p><b>IR 7.1 cont'd.</b></p> <p>Malaria control (using anti-malarial medications and increased use of insecticide-treated nets).</p>	<p>Negative Determination with Conditions 22 CFR 216.3 (a)(2)(iii)</p>	<p>See conditions under IR 7.3, for increased use of ITNs</p>
<p><b>IR 7.2: Increased Sudanese capacity, particularly women's, to deliver and manage health services.</b></p> <p>Providing technical assistance; education and training workshops for health workers; information analysis, documentation and transfer for distribution of training materials, development of cost-sharing policy modules, acceleration of community training, establishment of basic public health systems; and formulation of health policies (e.g. treatment and control of malaria and tuberculosis);</p>	<p>Categorical Exclusion: 22 CFR 216.2 (c)(2)(i), education, technical assistance or training; 216.2 (c)(2)(iii): analyses, studies, academic or research workshops and meetings; 216.2 (c)(2)(v): document and information transfer; 216.2 (c)(2)(viii) for programs involving nutrition, health care or population and family planning services; and 216.2(c)(xiv) programs intended to develop capability of recipient countries to engage in development planning.</p>	<p>No biophysical interventions involved</p> <p>CE applies except to the extent that activities might directly affect the environment (such as construction of facilities, water supply systems, waste water treatment extent designed to include activities, etc.)</p>
<p><b>IR 7.2, cont'd.</b></p> <p>Providing sub-grants</p>	<p>Negative Determination with Conditions- 22 CFR 216.3 (a)(2)(iii)</p>	<p>Must be subjected to a screening process to identify appropriate adverse impact mitigation and monitoring measures. (Further details regarding the environmental screening process are given following this table.)</p>
<p><b>IR 7.2, cont'd.</b></p> <p>Construction of or rehabilitation of community health worker training institutes</p>	<p>Negative Determination with Conditions- 22 CFR 216.3 (a)(2)(iii), as these will have a direct effect on the environment</p>	<p>Team responsible for the construction and related activities is expected to consult the Africa Bureau <i>Environmental Guidelines for Small-scale Activities in Africa (EGSSAA)</i>. The URL is: <a href="http://www.encapafrika.org/SmallScaleGuidelines.htm">http://www.encapafrika.org/SmallScaleGuidelines.htm</a> (Further details regarding small scale construction conditions</p>

Key Elements of Program/Activities	Threshold Determination & 22 CFR 216 Citation	Impact Issues & Mitigation Conditions and/or Proactive Interventions
		are given following this table.)
<p><b>IR 7.3: Increased demand for health services and practices.</b></p> <p>Technical assistance; education and training workshops; development of radio communication programs; meetings; and, information documentation analysis and transfer for dissemination of health information, support for primary health care centers.</p>	<p>Categorical Exclusion: 22 CFR 216.2 (c)(2)(i), education, technical assistance or training; 216.2 (c)(2)(iii): analyses, studies, academic or research workshops and meetings; 216.2 (c)(2)(v): document and information transfer; and 216.2 (c)(2)(viii) for programs involving nutrition, health care or population and family planning services.</p>	<p>No biophysical interventions involved</p>
<p><b>IR 7.3, cont'd.</b></p> <p>Providing sub-grants</p>	<p>Negative Determination with Conditions, 22 CFR 216.3 (a)(2)(iii)</p>	<p>Must be subjected to a screening process to identify appropriate adverse impact mitigation and monitoring measures. (Further details regarding the environmental screening process are given following this table.)</p>
<p><b>IR 7.3 cont'd.</b></p> <p>Malaria control, through increased use of insecticide-treated nets.</p> <p>Activities to increase access and use of long-lasting insecticide treated bednets (LLITN).</p> <p>Insecticidal treatment or re-treatment of ITNs</p>	<p>Negative Determination with Conditions, 22 CFR 216.3 (a)(2)(iii)</p> <p><b>Deferred:</b> Treatment or retreatment of nets</p>	<p>If provision of supplies will include insecticide treated bednets (ITNs), the USAID/SFO Health Team and partner organizations will be required to use reliable brands of long-lasting treated nets and adhere to other the stipulations made in the USAID Africa Bureau <a href="#">Programmatic Environmental Assessment for Insecticide-Treated Materials in USAID Activities in Sub-Saharan Africa</a> (ITM PEA).</p> <p>If a need for net treatment or retreatment arises, USAID/SFO will draft and gain approval for a “Pesticide Evaluation Report and Safer Use Action Plan” (PERSUAP) for the ITN program. If any vector control measures involving pesticides are recommended, these pesticides must be approved by</p>

<b>Key Elements of Program/Activities</b>	<b>Threshold Determination &amp; 22 CFR 216 Citation</b>	<b>Impact Issues &amp; Mitigation Conditions and/or Proactive Interventions</b>
		the USEPA and the GFDRC, and a PERSUAP covering safe use of these pesticides prepared.
<p><b>IR 7.3 cont'd.</b></p> <p>Establishment of HIV/AIDS voluntary counseling and testing (VCT)</p>	<p>Negative Determination with Conditions, 22 CFR 216.3 (a)(2)(iii)</p>	<p>Mitigating Actions:</p> <p>For activities that will involve expanded provision of the VCT services, the development and implementation of a medical waste management program is advised. Consult EGSSA (<a href="http://www.encapafrika.org">www.encapafrika.org</a>) and utilize the Minimal Program Checklist (Annex A).</p> <p>(Further details re: medical waste management conditions are given following this table.)</p>
<p><b>IR 7.4: Improved access to safe water and sanitation.</b></p> <p>Technical assistance for water and sanitation maintenance; education and training workshops for public health and hygiene promotion and hand pump maintenance; meetings; dissemination of health information, and community sensitization.</p>	<p>Categorical Exclusion: 22 CFR 216.2 (c)(2)(i), education, technical assistance or training; 216.2 (c)(2)(iii): analyses, studies, academic or research workshops and meetings; 216.2 (c)(2)(v): document and information transfer; and 216.2 (c)(2)(viii) for programs involving nutrition, health care or population and family planning services.</p>	<p>No biophysical interventions involved, per se.</p>
<p><b>IR 7.4 cont'd.</b></p> <p>Providing grants, and food for work programs</p>	<p>Negative Determination with Conditions, 22 CFR 216.3 (a)(2)(iii)</p>	<p>Must be subjected to a screening process to identify appropriate adverse impact mitigation and monitoring measures</p>
<p><b>IR 7.4 cont'd.</b></p> <p><b>Small-scale construction, Water &amp; Sanitation infrastructure:</b> Drilling new boreholes and rehabilitation of old boreholes; development of traditional hand-dug shallow wells; protection of water catchments areas (forests); and, construction of new latrines and rehabilitation of old latrines</p>	<p>Negative Determination with Conditions, 22 CFR 216.3 (a)(2)(iii)</p>	<p>Will have a direct effect on the environment. Mitigation: The team responsible for the construction and related activities is expected to consult and apply the best practices and principles in the Africa Bureau <i>Environmental Guidelines for Small-scale Activities in Africa</i> (EGSSAA). The URL is: (<a href="http://www.encapafrika.org/SmallScaleGuidelines.htm">http://www.encapafrika.org/SmallScaleGuidelines.htm</a>)</p>

<b>Key Elements of Program/Activities</b>	<b>Threshold Determination &amp; 22 CFR 216 Citation</b>	<b>Impact Issues &amp; Mitigation Conditions and/or Proactive Interventions</b>
		(Further details regarding small scale construction and water and sanitation conditions are given following this table.)

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## Style Tips for IEE Writers<sup>3</sup>

Last Updated: April 28, 2004

Simple, clear writing helps improve the quality of analysis, and speeds the review and approval of environmental reviews. The Africa Bureau Environmental Officer therefore asks that you follow these style tips for writers preparing IEEs and other environmental documentation that covers Africa Bureau activities:

- In general, IEEs and/or Requests for Categorical Exclusion should be prepared at the Strategic Objective or otherwise most inclusive level possible (e.g., IR). The basic organization of each IEE should be as given in the attached templates.
- The key organizing principle for the entire document should be a listing of the activities and/or intermediate results covered by the SO. Each section, to the extent relevant (mainly Section 1, 3, 4, and the summary), should refer to the IRs and activities. Use this organization scheme in 1) describing the activities; 2) analyzing the potential environmental impact of each activity, 3) recommending threshold decisions for each IR/activity, and 4) proposing mitigation measures for each IR's/activity's potential impacts.
- Keep writing simple & clear. Use short sentences. ~~The passive voice should be avoided...~~ Avoid the passive voice.
- For amendments, include the following information in the first paragraph of the Summary:
  - Identify the IEE being amended;
  - state the reason for the amendment;
  - summarize the differences between the amendment & the original in terms of activities & environmental determinations.
  - when some parts of the determinations in the previous IEE are being carried forward without amendment, be sure to summarize what those parts indicated, and particularly any conditions which must still be followed.
- Be brief. Tell what the activity involves, what impact it may have, & what you propose be done about that. If supporting documents are needed, attach them &/or refer to them, but there is no need to copy huge passages into the IEE.
- Use bullets, tables & other formatting devices to best organize information & to reduce verbiage. For example, a table is most often the best way to present the findings in Section 4, Recommended Threshold Decisions & Mitigation Actions.
- Limit the Summary of Findings section on the face sheets to one page if at all possible, two pages at a maximum. The Summary of Findings must include all Threshold Determinations and applicable Conditions, if any. The Section 5 Summary of Findings may be longer.
- Refer to other IEEs as models when drafting an IEE...but do so carefully. Look for similar IEEs when harvesting technical suggestions, but take care to also look for good style examples that meet the above recommendations.

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<sup>3</sup> Refer to the [Environmental Procedures Training Manual](#) (EPTM) (AFR Edition), Chapters 3 & 4 for comprehensive guidance on the choices and approaches for preparing environmental documentation. See the attached annotated templates.

Note that the EPTM Annex C presents two IEE formats, one for Title II (Food for Peace) activities, another for non-Title II activities. The difference is only in the Face Sheets formats. For historical reasons, we continue to use two different formats in the Africa Bureau., thus present both. But the Request for Categorical Exclusion and the narrative formats are the same for both.

- Send the IEE to the REO for review and editing before submitting to the Africa Bureau BEO in Washington for clearance. See Figure 3.3 in the [EPTM](#) for Africa, IEE Submission Process.

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## USAID Biosafety “First Review, Proposal and Reporting” Requirements<sup>4</sup>

Introductory note: USAID’s “Biosafety Procedures for Genetic Engineering Research” are still in draft, and are intended to be promulgated as ADS Chapter 211, replacing the current section of ADS 201 regarding the environmental review requirements for biosafety. Until ADS 211 is approved, however, the operative ADS guidance is found in ADS 201.3.12.2(b). This section provides that “if an activity will potentially involve the use of genetically modified organisms in research, field trials, or dissemination, the activity must be reviewed and approved for compliance with applicable U.S. requirements by the Agency Biosafety Committee in Washington before the obligation of funds and before the transfer, testing, or release of biotechnology products into the environment.” This guidance further states that a biosafety review is separate from and should precede the Regulation 216 review, although each review informs the other.

The gap between existing Agency biosafety review policies and those intended by the draft ADS 211 is not, in practice, a large one. The draft ADS 211 is essentially an elaboration of the process envisioned by ADS 201 for a biosafety review. Compliance with ADS 201’s biosafety review requirements is achieved, therefore, by complying with the requirements of draft ADS 211. Essential, however, is that the biosafety review must precede the Regulation 216 review. In practice, this means that a threshold decision on an activity involving genetically engineered organisms must be deferred until completion of the biosafety review procedures outlined below.

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Summarized here is ADS Section 211.3.1, regarding mandatory procedures for the transfer to, testing of, or use outside of contained facilities in developing countries of all GE products (e.g., plants, microorganisms, livestock vaccines, animals, or insects). Laboratory research involving GE products in both the U.S. and developing countries is covered under current USAID provisions referencing National Institutes of Health (NIH) guidelines. The mandatory procedures apply to:

- All USAID-funded transfers of GE products from the U.S. to developing countries for testing or use outside a contained facility;
- Testing of GE products in the developing country in which they were developed; and
- Transfer of GE products from one developing country to another.

USAID-funded GE-product development and implementation partners are prohibited from transferring or releasing GE products prior to obtaining the required written approval from USAID, as detailed in ADS 211.3.1. In addition, applicable national laws (e.g., biosafety, shipping/packaging, sanitary, or phytosanitary standards) must be adhered to.

**Regarding the first review of initial transfer, testing, or use (ADS 211.3.1),** the responsible actors (grantee /contractor, etc.), shall follow the USAID biosafety review process:

**Proposal.** The implementing parties must provide a proposal containing required information on the transfer, testing, or use that the grantee/contractor proposes. The proposal goes to the USAID Cognizant Technical Officer (CTO) or Strategic Objective (SO) Team. Before transferring, testing or using GE products, the grantee/contractor must have written approval for this action from the USAID Biosafety Officer.

**External Review for USAID.** This proposal will be forwarded by the CTO to the USAID Biosafety Officer for external review. The Biosafety Officer will arrange for an external biosafety review of the proposal.

**Certification of Host Country Approval.** Documentation must be provided demonstrating approval by the host country authorities of the proposed transfer, testing, or use that the grantee/contractor must provide to the USAID

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<sup>4</sup> Condensed from the draft USAID Automated Directives System (ADS), Chapter 211 “Biosafety Procedures for Genetic Engineering Research.” Summarized here is ADS Section 211.3.1

CTO or SO Team. If the country has a national biosafety authority or focal point (e.g., as required by Parties to the Cartagena Protocol on Biosafety), the letter of approval must come from this designated authority.

These procedures in this section apply to the first transfer, testing, or use of a particular GE product under a particular set of conditions. Streamlined procedures for the subsequent transfer, testing, or use of the same GE product under the same set of conditions are stated in 211.3.2.

The grantee/contractor or host country collaborator must submit to the USAID CTO or SO Team a letter or letters from the relevant authority in the host country approving the transfer and/or release of the GE product, including any specific conditions imposed by the host country.

USAID will not grant approval of the transfer, testing, or use in the absence of this letter or letters of approval. Approval is granted in the form of written authorization from the USAID Biosafety Officer.

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## Reg. 216 & Development Credit Authority Model Loan Portfolio Guarantee

[to be refined –WIK]

From: Doswell, Karen(EGAT/DC)

Sent: Tuesday, April 06, 2004 8:24 AM

To: Knausenberger, Walter (REDSO/ESA/FS); Hirsch, Brian(AFR/SD); Thompson, George(LAC/RSD); Jones, Philip(E&E/EG); Wilson, John O(ANE/TS); DesRosiers, J. Paul; Resch, Tim(ANE/SPOTS)

Cc: Goshgarian, Sandra(EGAT/DC); Eskesen, Alison L.(EGAT/DC); Grau, Gabriel(EGAT/DC); Hagger, Jeremy J D(EGAT/DC); Freedman, Paul(GC/G); Hester, James S(EGAT/ESP); Wasielewski, John E(EGAT/DC); Grossman, David G(EGAT/DC); Parker, Joakim (KIEV/DIR)

**Subject: RE: Reg 216 and DCA -- Equator Principles, GDA**

I recently joined the Office of Development Credit in EGAT after having served as a legal advisor in GC and as an RLA in Nairobi and in Haiti. While working on DCA deals in various countries, I (and others in ODC) have noticed inconsistent application of Reg 216 to USAID DCA deals around world; i.e., IEEs for substantially similar activities are reaching different conclusions and in some cases aren't ever done. Because we are concerned about inconsistencies in interpretation and application of Reg 216 in the different regions, I would like to meet with you, the environmental experts and bureau representatives, to get your views on the application of Reg 216 to DCA. Hopefully we can come up with a consensus about interpretation and application and spread a disseminate a consistent message to the bureaus and missions.

Here is the language in the model loan portfolio guarantee:

- a) The Loan must not be used to finance any of the following:
  - (1) Goods or services which are to be used primarily to meet military requirements or to support police or other law enforcement activities,
  - (2) Surveillance equipment,
  - (3) Equipment, research and/or services related to involuntary sterilization or the performance of abortion as a method of family planning, or
  - (4) Activities which significantly degrade national parks or similar protected areas or introduce exotic plants or animals into such areas,
  
- (b) The Loan must not be used to finance any of the following without the prior written approval of USAID:
  - (1) Pharmaceuticals,
  - (2) Pesticides,
  - (3) Logging equipment,
  - (4) Luxury goods (including alcoholic beverages and jewelry),
  - (5) Establishing or expanding any enterprise that will export raw materials that are likely to be in surplus in world markets at the time such production becomes effective and that are likely to cause substantial injury to U.S. producers,
  - (6) Activities which would result in the loss of forest lands due to livestock rearing, road construction or maintenance, colonization of forest lands or construction of dams or other water control structures,
  
- (7) Activities which are likely to have a significant adverse effect on the environment, including any of the following (to the extent such activities are likely to have a significant adverse impact on the environment):
  - (a) programs of river basin development,
  - (b) significant irrigation or water management projects (including dams and impoundments),
  - (c) agricultural land leveling,
  - (d) major drainage projects,

- (e) large scale agricultural mechanization,
- (f) new lands development,
- (g) resettlement projects,
- (h) penetration road building or road improvement projects,
- (i) construction of powerplants or industrial plants, or
- (j) large scale potable water and sewerage projects,

(8) Activities which are likely to involve the loss of jobs in the United States due to the relocation or expansion outside of the United States of an enterprise located in the United States, or

(9) Activities which the Guaranteed Party is aware are reasonably likely to contribute to the violation of internationally recognized rights of workers.

Approval of loans to finance activities described in subsections (2), (3), (6) or (7) above will be contingent upon the submission by the Guaranteed Party of evidence sufficient to demonstrate compliance with local environmental laws and to enable USAID to make an assessment of the environmental impact of such activities.

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**DCA policies and guidelines can be found in several places.** ADS 249 is a good place to start, though that section does not specifically address environmental considerations. The DCA office is considering whether or not to include such language in the next revision. Our office is not planning to prepare a Briefing Document. From my perspective, I think the discussion we had achieved the desired outcome. The DCA office does not want to usurp the role of the environmental officers whose job it is to apply Reg 16 by dictating environmental policies. The point was only to discuss the limitations and intentions of DCA in the environment context.

I don't think I said that 90% of the banks have sound environmental policies – at least I didn't mean to say that. I would have no way of knowing. Rather, 90% of the DCA transactions this office does have complimentary technical assistance components, and that such TA can in fact address environmental considerations. It is TA, not DCA that should address changes to the banks' environmental practices.

I don't want to speak for the GDA office. But I would argue that because the mechanisms it uses vary (grants, contracts, MOUs, DCA transactions) the environmental considerations of each mechanism continue to apply in the GDA context.

Thanks again for your input Walter. We will take this and the contributions of the other environmental officers into consideration when talking to missions about potential uses of DCA and complimentary TA.

Karen

-----Original Message-----

From: Doswell, Karen(EGAT/DC)

Sent: Monday, April 05, 2004 11:47 PM

To: Knausenberger, Walter (REDSO/ESA/FS); Hirsch, Brian(AFR/SD); Thompson, George(LAC/RSD); Jones, Philip(E&E/EG); Wilson, John O(ANE/TS); DesRosiers, J. Paul; Resch, Tim(ANE/SPOTS)

Cc: Goshgarian, Sandra(EGAT/DC); Eskesen, Alison L.(EGAT/DC); Grau, Gabriel(EGAT/DC); Hagger, Jeremy J D(EGAT/DC); Freedman, Paul(GC/G); Hester, James S(EGAT/ESP); Wasielewski, John E(EGAT/DC);

Grossman, David G(EGAT/DC); Parker, Joakim (KIEV/DIR)

Subject: RE: **Reg 216 and DCA**

Thanks Walter. Yes, we had a very useful meeting. **The following is a brief summary of the issues we discussed:**

The purpose of the meeting was to move toward consistency in application of 216 to DCA activities and find out if there are any particular issues or practices in any region. We talked about the role of DCA and how it differs from other agency tools (grants, contracts and CAs). I emphasized that DCA, is not necessarily designed or intended to change the environmental procedures and policies in place at the financial institutions with whom we work.

Rather, the goal of DCA is to mobilize local capital and urge financial institutions to lend to qualified borrowers they otherwise would not lend to because of perceived notions of risk. DCA is meant to reduce risk to those financial institutions through the provision of USG-backed guarantees. What DCA is not designed to do, is make the bank any more environmentally-friendly or otherwise change its existing environmental procedures. The injection of technical assistance either through regulatory reform, bank and SME training like the one identified by Brian, etc., something that is utilized 90% of the time in conjunction with DCA activities, is the development assistance tool that is more suited to changing the environmental behavior of USAID partners, including financial institutions that have received the benefit of a USG guarantee.

That said, I distributed copies of the relevant pages of the standard loan portfolio guarantee agreement that included the environment-related provisions. I did this to demonstrate how, notwithstanding the preceding paragraph, USAID does set an environmental standard consistent with USAID law and policy. While the guarantee agreement does not prohibit certain environmentally-sensitive loans to be made by the bank, it does remove from guarantee coverage those loans made by the bank that (for example) “significantly degrade national parks or similar protected areas or introduce exotic plants or animals into such areas” and requires USAID’s prior written approval for loans that involve “pharmaceuticals, pesticides, logging equipment, and other activities that are likely to have a significant adverse effect on the environment”. The agreement also states that loans will be “contingent upon the submission by the [bank] of evidence sufficient to demonstrate compliance with local environmental laws and to enable USAID to make an assessment of the environmental impact of such activities.” So while we can’t (nor do we necessarily want to through the DCA guarantee) prevent the financial institution from making loans to SMEs that may not be engaged in environmentally- friendly practices, we have taken measures to ensure that such loans do not benefit from USAID credit enhancement assistance.

We also discussed the major guarantee facility types and the application of Reg 216 to each. We readily agreed that in the context of a loan portfolio guarantee where the individual loans made by the financial institution are described in general terms (i.e., SMEs or mortgagees in a certain geographic area) and are not approved by USAID, a categorical exclusion based on (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 institutions” – is appropriate. Though it is less clear cut in the context of a loan portfolio guarantee where the loans are approved by USAID (this very rarely occurs), a negative determination without conditions can be made, assuming the category of loans covered does not include environmentally-sensitive activities - for example, water sanitation projects. In the context of loan portfolio guarantees that specifically involve environmental issues (i.e., loans for water sanitation projects, construction, logging, etc) the environmental officer and the legal advisor should work together to determine what should be included in the IEE and in the guarantee agreement to limit USAID’s exposure to adverse publicity and increased Congressional scrutiny and bad environmental practices in general. Loan guarantees, portable guarantees and bond guarantees should generally qualify for categorical exclusion (x) cited above.

We also agreed that it is a good idea to encourage environmental reviews to be done at the SO and, in some cases, the IR level. The DCA office supports the environmental officers in promoting SO/IR level environmental reviews.

We learned that it has become the practice in the E&E region for USAID missions to provide banks that have received a USAID guarantee with an environmental “checklist”. The banks are encouraged to use the checklist when making loans to promote environmentally-friendly lending. The DCA office is of the view that the guarantee agreement contains sufficient safeguards to limit the likelihood that an activity with a negative environmental impact would be covered by the USAID guarantee. The office recognizes that it does not prevent or even deter the bank from making anti-environment loans, it only prevents such loans from receiving the benefit of guarantee coverage. The DCA office believes that the checklist should be used when the loan portfolio clearly contains environmentally-sensitive activities or when it can be incorporated into a technical assistance component of assistance to the lender and/or borrowers where the goal of the assistance is to affect the bank’s or borrowers’ business decisions as they relate to environmentally-friendly practices. As stated above, DCA is not the appropriate tool to use as a means to modify the bank’s lending criteria.

There are no anticipated “next steps”. The goal of the meeting - to present the perspective of the DCA office and to find out how each region handles DCA deals - I believe was accomplished. The DCA office is always reviewing its policies and operations and is open to suggestions for improvement. However, the office does not

believe that the DCA policy should be amended to require the imposition of environmental standards on the bank's practices above and beyond that which is already in the guarantee agreement.

Thanks to all for your participation and valuable input.

Karen

-----Original Message-----

From: Knausenberger, Walter (REDSO/ESA/FS)

Sent: Monday, April 05, 2004 2:53 AM

To: Hirsch, Brian(AFR/SD); Doswell, Karen(EGAT/DC); Thompson, George(LAC/RSD); Jones, Philip(E&E/EG); Wilson, John O(ANE/TS); DesRosiers, J. Paul

Cc: Goshgarian, Sandra(EGAT/DC); Eskesen, Alison L.(EGAT/DC); Grau, Gabriel(EGAT/DC); Hagger, Jeremy J D(EGAT/DC); Freedman, Paul(GC/G); Resch, Tim(ANE/SPOTS); Hester, James S(EGAT/ESP)

Subject: RE: Reg 216 and DCA

Folks:

Glad to see some attention finally being paid to this issue; it has something I've been concerned about for years, and I have at least tried to get it captured within our SO-level umbrella IEEs, providing for subsidiary environmental review within the DCA-funded programs, or some device to promote environmentally sound decisions. The Cleaner production training to which Brian refers (held so far in Mozambique and Namibia), arose out of a recognition of this sort of need.

I submit that the DCA guidance itself needs to be re-visited. Likewise, this is very analogous to the due diligence we should be expecting with GDA programs.

I shall appreciate learning what the conclusions of the meeting on 30 March 2004 were, and what the next steps are expected to be.

Walter I. Knausenberger, Ph.D.  
Senior Regional Environmental Advisor  
U.S. Agency for International Development  
Regional Economic Development & Services Office (REDSO/ESA)  
P.O. Box 30261  
Nairobi, Kenya

-----Original Message-----

From: Hirsch, Brian(AFR/SD)

Sent: Thursday, April 01, 2004 1:51 AM

To: Doswell, Karen(EGAT/DC); Thompson, George(LAC/RSD); Jones, Philip(E&E/EG); Wilson, John O(ANE/TS); DesRosiers, J. Paul

Cc: Goshgarian, Sandra(EGAT/DC); Eskesen, Alison L.(EGAT/DC); Grau, Gabriel(EGAT/DC); Hagger, Jeremy J D(EGAT/DC); Freedman, Paul(GC/G); Resch, Tim(ANE/SPOTS); Knausenberger, Walter (REDSO/ESA/FS)

Subject: RE: Reg 216 and DCA

Thanks for the very useful meeting today, Karen. On a related note, I wanted to bring to everyone's attention a training program recently delivered by the Tellus Institute and TechnoServe for USAID/Namibia's partners, "Improving Micro- and Small Enterprise Success Rates through Cleaner Production." This course was developed as a revision of the Bureau's course on environmental assessment and environmentally sound design, and targets Business Development Service providers. I point this out as an example of environmentally-focused interventions an SO can consider as part of an overall package of activities in promotion of small business development.

For more details about the course, see [http://www.encapafrika.org/MSE\\_CP\\_Course/index.htm](http://www.encapafrika.org/MSE_CP_Course/index.htm).

Brian

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## Reg. 216 & Global Development Alliances<sup>5</sup>

### *USAID Statutory and Policy Requirements*

At this stage, you should address the normal list of statutory, regulatory and policy requirements that apply to USAID-funded activities. For instance, USAID's environmental review requirement will need to be addressed in accordance with USAID Reg. 216. In general, as with any activity, the items listed in the country and activity checklists that are updated annually by GC should be addressed and complied with. The FY 2002 statutory checklists are expected to be added as a reference to ADS 200 in the near future. In addition to these checklists, you will need to consider the applicability of the Agency's policy determinations and statements on various subjects that are included as references to the ADS 200 series. This of course assumes that USAID will be providing financing for the alliance. In some situations, USAID may simply play a matchmaker role, or may provide in-kind resources rather than direct funding.

### *Due Diligence*

Once you have an idea of whom your alliance partners might be, it makes little sense to move forward with the alliance without first assessing the past performance, reputation and future plans of the prospective alliance partner with regard to various business principles and practices.

What is due diligence? A "due diligence" investigation is a well thought out inquiry of a prospective partner that must be carried out prior to engaging in alliance negotiations. While a due diligence exploration can take many forms and range from quick and simple to long and complicated, its essence is to investigate what is often called the "triple bottom line"—i.e., is the prospective partner socially responsible, environmentally accountable and financially sound.<sup>6</sup> To assist you, a guide to conducting the due diligence investigation is found in [Attachment A](#). For ease of use, the guide features key questions and references to important web sites that will be of use to you. Please contact the GDA Secretariat should you require further assistance or need additional information.

#### **Checking Integrity**

The World Bank's [Business Partnerships and Outreach Group](#) has developed succinct criteria for determining the integrity of prospective partners.

Another way to quickly check on the integrity of a prospective corporate partner is to find out if the company "embraces and enacts" the United Nations Global Compact's [Nine Principles](#). These principles cover topics in human rights, labor and environment.

Alternatively, you might look to see if the firm endorses the [Global Sullivan Principles](#) of corporate social responsibility. These principles support economic, social and political justice by companies where they do business; human rights and equal opportunity; disadvantaged workers; and greater tolerance and understanding among peoples.

Several of these criteria have been included in the due diligence guide found in [Attachment A](#).

As you browse the guide, keep in mind three things. First, *it may not be necessary to investigate every possible avenue of consideration*. For most transactions that you might consider, it would be too costly and too time consuming. Particularly for small alliances, too much due diligence can kill the transaction. Note also that due diligence, once beyond an initial phase, *is an ongoing process*. Indeed, alliances take time to develop, implement and manage.

As a final point, note that it is not a requirement that a prospective alliance partner must have adopted any one or more of the several sets of international principles referred to in the guidance (some examples of which are noted in the inset boxes on the foregoing page and on page 7). Rather a prospective partner's adoption of such principles is a factor for USAID to consider in making an informed decision about whether a company would be an appropriate alliance partner.

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<sup>5</sup> Excerpted from: *Tools for Alliance Builders*. April 3, 2002. Prepared by the Global Development Alliance Secretariat. USAID. Washington, D.C.

<sup>6</sup> Further information on the triple bottom line is available from [SustainAbility](#).

In sum, the guide is meant to serve as a menu from which you choose those items that warrant further investigation. Be sure to make conscious and informed, not random, decisions when conducting due diligence.

### ***Conflict of Interest Considerations***

Planning collaboratively with alliance partners, one or more of who may well become USAID's implementing partners or otherwise receive USAID funds, requires your careful attention because of the possibility for organizational conflict of interest (OCI). The Supplementary Reference to ADS 201 and 202, [\*Legal and Policy Considerations When Involving Partners and Customers On Strategic Objective Teams and Other Consultations\*](#), discusses what constitutes OCI and what restrictions must be placed on partners to avoid it. In brief, OCI restrictions are not required when outside organizations participate in:

1. Discussions regarding concepts, ideas or strategies, i.e., the stage prior to identifying possible implementation instruments.
2. Discussions regarding ongoing and completed activities (whether under contracts or assistance instruments).
3. Matters involving only assistance (not contract) instruments, both during the competition stage and once the activity is in progress.

In discussions regarding concepts, ideas and strategies, the key question is the extent of association with a specific procurement—e.g., does the discussion of concepts, ideas and strategies spill over into decisions about the implementation instrument to be used and/or details that will be written into the statement of work. OCI does not exist in the abstract. If one cannot identify a procurement that would be compromised by discussions with outside organizations, then there is no OCI under the federal standard.

# Attachment A: USAID’s 2002 GDA Due Diligence Guide

## ***Due Diligence for Private Enterprise***

Listed below are the four essential areas for investigation—corporate image, social responsibility, environmental accountability and financial soundness—that comprise the minimum requirements for responsible due diligence.

Since due diligence is such a crucial part of the partnering process, serious attention must be given to the topic before embarking on a strategic alliance. Therefore and where possible, it is recommended that a more comprehensive due diligence investigation be undertaken to enable the Agency to make the right decision on whether to partner with a particular firm.

Remember, though, that it may not be necessary to investigate every possible avenue of consideration. For most transactions you might consider, it would be too costly and too time consuming. Particularly for small alliances, too much due diligence can kill the transaction. The guide is meant as a menu of items to choose from. Use the menu to select what you want to investigate and what you will overlook. Make conscious and informed—not random—decisions of the possible lines of investigation. A way to do this is to develop a due diligence strategy considering the following factors:

1. What’s important to the Agency? What isn’t?
2. Which problems will be costly? Which ones will be minor?
3. Where are you likely to find problems? Where are you unlikely to find problems?
4. What is the type of transaction you are expecting? How large or small is the transaction? How complex? What will the investigation cost in time and in money?
5. What is the risk to the Agency if the unexpected causes the transaction to go bad?
6. How much time do you have? What do you have to lose by delay? What does the potential partner have to lose? How badly does the Agency need the alliance? How badly do the potential partners?

## ***Essential Areas for Investigation***

There are a number of business-oriented resources available that can help you find answers to the questions below. [Dun & Bradstreet](#) reports primarily on publicly-traded companies, while coverage of private companies may be limited. The [SEC](#) provides basic corporate and financial information on US companies with more than \$10 million in assets and at least 500 shareholders. A [Lexis-Nexis](#) search can be used for gathering news stories about a company within a specific timeframe. This may be a good place to start when researching private companies.

To order a report by Dun & Bradstreet or conduct a Lexis-Nexis search, contact Leah Molyneu (202-712-0579; or <mailto:lmolyneu@dis.cdie.org>) of USAID’s Center for Development Information and Evaluation (CDIE).

A number of “watch dog” organizations also provide information on companies. However, be aware that such information may reflect a particular point of view and require appropriate filtering. One group, [CorpWatch](#), provides hyperlinks to other sites in a step-by-step guide to researching backgrounds of companies. Other groups include [Corporate Watch](#) (the UK’s version of Corpwatch), the [Public Information Network](#), [Public Citizen](#) and [Corporate Governance](#).

In addition, there are a number of organizations that charge a subscription fee for information that the GDA Secretariat or CDIE may be able to access.

Note that the GDA Secretariat is investigating the feasibility of subscribing to the Inter-Agency Corporate Information Tool, a database developed by the World Bank and UN agencies that contains reviews of companies. Contact the GDA Secretariat for additional information.

### A. Corporate image

1. What is the company’s public image? Have there been any tensions between the community and the company?

2. Has there been anything in the media that would reflect negatively upon the company? If so, how has the company dealt with significant negative publicity?
3. Are there any pending lawsuits against the company?
4. Is the company looking *solely* for PR opportunities by aligning itself with USAID?
5. Is the company only or primarily looking for procurement opportunities or money from USAID?
6. Is the company willing to engage with USAID in a transparent manner without expecting an exclusive relationship (i.e., barring competitors)?
7. Is the company willing to accept limitations on the publicity (i.e., press and media coverage) of the alliance so as to ensure that USAID is not perceived to be endorsing the company or its products and services?

B. Social responsibility

1. Is the company primarily involved in the manufacture or sale of firearms or narcotics, i.e., involvement in these activities constitutes a significant share of company's total portfolio?
2. Does the company have a good reputation (no serious red flag issue areas), especially in areas of corporate social responsibility (CSR)? In the case of new companies or companies with past CSR troubles, are they committed to instituting/improving a sound CSR policy?
3. Does the company have policies barring harmful child labor or forced labor?
4. Does the company have a non-discrimination policy governing the hiring and promotion of minorities, women?
5. Is the company accepting of unions or attempts to organize a union?
6. Does the company have a health and safety action plan for workers, including the handling of hazardous materials and the prevention of environmental accidents?
7. Does the company have a policy for codes of conduct, labor standards?

C. Environmental accountability

1. Does the company collect and evaluate adequate and timely information regarding the environmental, health, and safety impacts of their activities?
2. Does the company set targets for improved environmental performance, and regularly monitor progress toward environmental, health, and safety targets?
3. Does the company assess, and address in decision-making, the foreseeable environmental, health, and safety-related impacts associated with the processes, goods and services of the enterprise over their full life cycle? And provide the public and employees with adequate and timely information on the potential environment, health and safety impacts of the activities of the enterprise?
4. Does the company maintain contingency plans for preventing, mitigating, and controlling serious environmental and health damage from their operations, including accidents and emergencies; and mechanisms for immediate reporting to the competent authorities?
5. Does the company continually seek to improve corporate environmental performance, by encouraging, where appropriate, the adoption of technologies and operating procedures in all parts of the enterprise that

reflect environmental best practices? Are its products or services designed to have no undue environmental impacts, be safe in their intended use, and be efficient in their consumption of energy and natural resources? Can they be reused, recycled, or disposed of safely?

6. Does the company have a green audit for environmental performance?
7. Is the company ISO certified?
8. Does the company have a natural habitats policy? A forestry issues policy?
9. Is the company free from regulatory lawsuits?

D. Financial soundness

1. Is the company a publicly traded company?
2. Does the company publish an annual report?
3. Does the company have audited financial statements?
4. Has the company been in business for several years?

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# USAID/AFR guidance: preparing PERSUAPs for pesticide programs in Africa

February 22, 2002

## *Overview of review requirements*

All USAID activities are subject to evaluation via, at minimum, an Initial Environmental Examination (IEE). Because of risk concerns presented by pesticides, the USAID environmental regulations require that at least the 12 factors outlined in the Pesticide Procedures described in 22 CFR 216.3 (b)(1)(i) (a through l) be addressed in the IEE for any program that includes assistance for the procurement or use of pesticides. The Africa Bureau asks that these factors be examined in a particular type of document, termed a “Pesticide Evaluation Report and Safer Use Action Plan” (PERSUAP), which is submitted as an attachment to the IEE. (Note: the IEE itself can be very brief, with the analytical work contained in the attached PERSUAP.) The PERSUAP focuses on the particular circumstances of the program in question, the risk management choices available, and how a risk management plan would be implemented in the field. Further details about what to include in a PERSUAP are given below.

Why is a local-level assessment such as a PERSUAP needed for USAID pesticide programs? To help in understanding the utility, consider the U.S. system for promoting pesticide safety. When the USEPA registers pesticides for use in the United States, it specifies the manner in which the product can be “safely” used (i.e., with an acceptably small risk), including safety equipment needed when applying the pesticide, how to apply it, the allowed uses, etc. But the context in which EPA makes these registration decisions is important to note. An extensive system of capabilities and resources exist in this country that help give EPA confidence these specifications will be followed and the product will be used appropriately. These include a 97% literacy rate meaning most of the population can read labels; close control by EPA over the content of the label; training requirements and programs for those pesticide products that require applicator certification; worker protection requirements; occupational safety regulations; and relatively effective federal, state and local enforcement mechanisms. In allowing the use of certain pesticides in its African programs, USAID cannot rely on the same societal capabilities and resources that the USEPA does to assure appropriate use of the product. The preparation of a PERSUAP gives a program manager the opportunity to consider practical actions by which to reduce the risks of using pesticide products in a program, taking into consideration the context in which the products will be used, the particular elements of the program, and the different capacities of the partners involved.

## *Who prepares a PERSUAP?*

Program managers are generally responsible for assuring that environmental review requirements for their programs are met, including PERSUAPs. As for all environmental reviews, guidance and assistance for PERSUAPs is available from the appropriate Mission Environmental Officer (MEO), Regional Environmental Officer (REO), the Africa Bureau Environmental Officer (BEO), or the BEO/DCHA if Title II (PL 480) funds are involved. Considerable reference materials, as well as examples of other PERSUAPs, are available through these contacts, or directly from the Africa Bureau’s ENCAP program website, [www.encapafrika.org](http://www.encapafrika.org).

## *Components of an activity-level PERSUAP*

A PERSUAP basically consists of two parts, a “PER” and a “SUAP.” The Pesticide Evaluation Report (PER) section addresses the 12 informational elements required in the Agency’s Pesticide Procedures. The Safer Use Action Plan (SUAP) puts the conclusions reached in the PER into a plan of action, including assignment of responsibility to appropriate parties connected with the pesticide program.

## **Below are three annexes which further elaborate the content needed in a PERSUAP:**

*1. Detailed guidance for developing a Pesticide Evaluation Report:* provides detailed guidance on the information that should be provided in the Pesticide Evaluation Report, following the 12 informational elements required by the Pesticide Procedures section of USAID’s environmental regulations.

2. *Representative Elements for a Safer Use Action Plan*: Describes the elements needed in a plan that takes action to assure issues resolved in the Pesticide Evaluation Report are resolved in the implementation of the development program being reviewed.

3. *“A Practical Guide To Reducing Pesticide Risks in Development Projects”*: This brief guide was prepared by staff of the UNFAO, and provides a useful list of problems to watch for as well as practical responses. USAID programs using pesticides would do well to use this guide as a checklist to look for problems and as a source of inspiration for ways to deal with those problems.

## Annex 1: Detailed guidance for the development of a Pesticide Evaluation Report

USAID “Pesticide Procedures” Element and Description (from USAID Pest Management Guidelines, 1991)	Specific Guidance for Pesticide PERSUAP
<p>a. <b>USEPA registration status of the proposed pesticide.</b> Pesticides are registered in the U.S. by active ingredient and by formulation. “Registration status” possibilities of the active ingredients and the formulated products include registered, never registered, and cancelled.</p>	<p>In the PERSUAP: <i>Identify the registration status in the U.S. and in the host country. Identify the formulated pesticide product to be used.</i></p> <p>USAID is effectively limited to using pesticide active ingredients registered in the U.S. by the U.S. Environmental Protection Agency for the same or similar uses. Other pesticides not registered in the U.S. may be authorized, but only if the USAID program can show that no alternatives are not available, as required under USAID Pest Management Guidelines for the use on non-U.S. registered pesticides. Host country pesticide registration procedures must also be identified and followed.</p>
<p>b. <b>Basis for selection of the pesticide:</b> This refers to the economic and environmental rationale for choosing a particular pesticide. In general, the least toxic pesticide that is effective is selected.</p>	<p>In the PERSUAP: <i>Explain the basis for selection of the pesticide product to be used, including active ingredient and formulation.</i></p> <p>Pesticide product selection may be driven by a number of factors, including efficacy, price, availability, safety, etc. All things being equal, a program should choose the pesticide active ingredient and formulation that presents the least overall risk.</p> <p>Formulation is a key determinant of toxicity, and should be considered in selecting a particular pesticide product. Formulation can also have an impact on exposure; for example, solid formulations can eliminate the potential for poisoning through accidental exposure to concentrated liquid product.</p> <p>Packaging can have a significant impact on exposure potential. Large containers necessarily introduce hazardous product transfer steps, as well as the possibility that the product will end up in a smaller, poorly labeled container. Smaller containers are generally better for use in USAID programs.</p>

<p>c. <b>Extent to which the proposed pesticide use is, or could be, part of an IPM program:</b> USAID policy promotes the development and use of integrated approaches to pest management whenever possible. This section discusses the extent to which the proposed pesticide use is incorporated into an overall IPM strategy.</p>	<p>In the PERSUAP: <i>Describe the extent to which the proposed product(s) is/are or could be a part of an IPM program. Describe the connection between the USAID activity and regional, national and local control programs (as appropriate).</i></p> <p>Integrated pest management, and its public health counterpart, integrated vector management, is USAID policy because it is the most effective, economical, and safest approach to pest control. “Integrated pest management attempts to control pests in an economically and environmentally rational manner; it emphasizes non-chemical tactics which cause minimal disruption to the ecosystem.”<sup>7</sup> USAID programs should assure that the choice of pesticides was made after consideration of other pest management options available, and that this is the most effective and environmentally sound option available.</p>
<p>d. <b>Proposed method or methods of application, including the availability of application and safety equipment:</b> This section examines in detail how the pesticide is to be applied and the measures to be taken to ensure its safe use.</p>	<p>In the PERSUAP: <i>As stated, describe in detail how the pesticide is to be applied and the measures to be taken to ensure its safe use.</i></p>
<p>e. <b>Any acute and long-term toxicological hazards, either human or environmental, associated with the proposed use, and measures available to minimize such hazards:</b> This section of the IEE examines the acute and chronic toxicological data associated with the proposed pesticide. In addition to hazards, this section of the IEE also discusses measures designed to mitigate any identified toxicological hazards, such as training of applicators, use of protective clothing, and proper storage.</p>	<p>In the PERSUAP: <i>Describe measures the program will take to reduce the potential for exposing humans or nontarget organisms to selected pesticides. Also describe monitoring measures that will allow the program to identify problems with users applying other pesticides.</i></p> <p><b>This should be the key section of the PERSUAP, in which the majority, or perhaps all, of the planned mitigation measures are described.</b> To address this element, the PERSUAP should summarize the toxicity to humans and other non-target organisms of the pesticide products chosen for the program in question, the potential exposure opportunities presented by those products, and the risk reduction actions the program will take to minimize such exposure opportunities. The risk reduction actions should be described in sufficient detail to show that they are indeed workable solutions. If protective clothing is recommended, for example, assurance should be provided that a sustainable source of such protective clothing has been identified, a schedule for its replacement, training in its use, etc.</p>

<sup>7</sup> USAID. 1990. Integrated Pest Management: A.I.D Policy and Implementation.

<p>f. <b>Effectiveness of the requested pesticide for the proposed use:</b> This section of the PERSUAP requires information similar to that provided in item b, but more specific to the actual conditions of application. This section also considers the potential for the development of pest resistance to the proposed insecticide.</p>	<p>In the PERSUAP: <i>Explain what recommendations or evidence suggests that the ITM products proposed are effective in the program area.</i></p>
<p>g. <b>Compatibility of the proposed pesticide use with target and non-target ecosystems:</b> This section examines the potential effect of the pesticide on organisms other than the target pest (for example, the effect on bee colonies kept in the area). Non-target species of concern also include birds and fish. The potential for negative impact on non-target species should be assessed and appropriate steps should be identified to mitigate adverse impacts.</p>	<p>In the PERSUAP: <i>Describe efforts that are being made to minimize environmental exposure to pesticide products.</i>  This section should address the toxicity of the products and the environmental risk mitigation measures that the program will take. The key options for environmental risk mitigation are product choice and exposure reduction. In this section, therefore, describe the relative environmental risk of the product chosen versus the other options. Also describe efforts the program will make to reduce exposure of the environment, through choice of pesticide product and packaging, preparation of educational materials, training, etc.</p> <p>This question might also be covered in response to question (e), and if so, simply reference that section without repeating it.</p>
<p>h. <b>Conditions under which the pesticide is to be used, including climate, flora, fauna, geography, hydrology, and soils:</b> This section examines issues such as the potential for contamination of surface and groundwater sources.</p>	<p>In the PERSUAP: <i>Describe the environmental conditions under which the pesticide is to be used, identifying any environmental factors that might be particularly sensitive or subject to contamination from re-treatment operations.</i></p> <p>This item refers to particular environmental factors that might accentuate the effects of exposure to pesticides, and the potential need for measures to reduce those risks. Examples of special conditions that need to be noted here include sensitive ecosystems in the project area and superficial groundwater tables.</p>

<p>i. <b>Availability of other pesticides or non-chemical control methods:</b> This section identifies other options for control of pests and their relative advantages and disadvantages.</p>	<p>In the PERSUAP: <i>Describe other pest management options being pursued in the geographic area of the activity, either as part of the USAID activity or otherwise, and explain why this particular vector control method was chosen over other available options.</i></p>
<p>j. <b>Host country’s ability to regulate or control the distribution, storage, use, and disposal of the requested pesticide:</b> This section examines the host country’s existing infrastructure and human resources for managing the use of the proposed pesticide. If the host country’s ability to regulate pesticides is inadequate, the proposed action could result in greater harm to the environment.</p>	<p>In the PERSUAP: <i>Summarize the host country’s capacity and structure for the regulation of public health and agricultural pesticides. Identify the approval/registration status of the pesticide product in the host country.</i></p> <p>The host country’s capacity and structure for the regulation of public health and agricultural pesticides should be summarized. A critical issue for a pesticide activity supported by the Agency is the extent to which the host country’s regulatory oversight will help to control distribution, storage, use and disposal of the pesticide products in question. USAID activities should always be in compliance with local environmental and public laws and regulations, but that is not necessarily enough. If host country regulatory systems and institutions are not sufficient to give a reasonable expectation that environmentally sound practices will be enforced, USAID still bears responsibility for assuring environmental protection at each of these steps in the pesticide life cycle.</p> <p>Government oversight over pesticides is important for controlling the quality of products as well as their environmentally-sound use and disposal. USAID programs of substantial size should generally include an element of capacity-building work with host country institutions that govern public health pesticide use. These measures should be identified in this chapter of the PERSUAP.</p>
<p>k. <b>Provision for training of users and applicators:</b> USAID recognizes that safety training is an essential component in programs involving the use of pesticides. The need for thorough training is particularly acute in developing countries, where the level of education of applicators may typically be lower than in developed countries.</p>	<p>In the PERSUAP: <i>Describe the provisions made to train and educate those who will be using the pesticides.</i></p>

<p>1. <b>Provision made for monitoring the use and effectiveness of this pesticide:</b> Evaluating the risks and benefits of pesticide use should be an ongoing, dynamic process.</p>	<p>In the PERSUAP: <i>Describe monitoring and evaluation programs for pesticide use activities, and the health and environmental safety-related information that is collected via this M and E capacity.</i></p> <p>Monitoring programs should actively investigate, to the extent possible, the following issues:</p> <ul style="list-style-type: none"> <li>• Effectiveness of information, education and communication materials and activities in promoting safe handling, use and disposal of pesticide products.</li> <li>• Adverse health and environmental effects and the frequency and severity with which they occur.</li> <li>• Quality control of pesticide products.</li> <li>• Effectiveness of the chosen products and their alternatives, including whether or not resistance is developing.</li> <li>• Safe and effective pesticide use and handling practices by program staff and end users.</li> </ul>
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## ***Annex 2. Representative Elements for Pesticide Safer Use Action Plan***

A pesticide safe use action plan should:

- ❖ **Be programmatically linked to national pesticide registration and pest management programs**
- ❖ **Ensure formal national registration of pesticides**
  - Establish pesticide quality standards and control procedures
  - Provide for enforcement
  - Require good packaging and clear and adequate labeling
- ❖ **Define and assure safe use practices**
  - Identify pesticides appropriate for use, selecting the least toxic insecticides and formulations possible, and considering non-pesticide alternatives.
  - Define appropriate methods of pesticide handling, storage, transport, use and disposal.
- ❖ **Assure accessibility of protective clothing and equipment needed.**
  - Training, development and distribution of appropriate information, education and communication
  - Specific IEC messages, along with sale and treatment, regarding the proper handling, use, disposal of pesticides, and related waste, at the distribution, storage, handling, use, disposal stages, at all levels, but especially at the village and household levels.
- ❖ **Emphasize operational research & monitoring & evaluation:** Roles of key actors
  - Quality control of insecticide(s)
  - Research on alternative insecticides and effectiveness under local conditions
  - Mosquito susceptibility to insecticide(s) of choice
  - Safe and effective use of insecticide by parties at all levels
- ❖ **Identify Roles and Responsibilities:**
  - Public Sector: coordination, regulatory oversight and management, defining environmental responsibilities, and others
  - Commercial Private Sector
  - Non-profit private sector, PVOs, NGOs
- ❖ **Integrate Mitigation Measures, for example:**
  - Choice of USEPA-recommended pesticides
  - Avoid disposal of treatment solution in bodies of water
  - Avoid washing application equipment where the residues would impinge on bodies of water
  - For bulk pesticides, provisions for spill prevention and clean-up
- ❖ **Disposal provisions for used pesticide containers**

## ***Annex 3. A Practical Guide to Reducing Pesticide Risks in Development Projects<sup>8</sup>***

**Basic principle of risk reduction:** risk must be evaluated in the local conditions of the project or activity.

### **1) Some common errors**

- Pesticide not registered in the host country
- Pesticide not evaluated/registered in the country of origin (OECD)
- Pesticide not efficacious for the planned use
- Formulation is not stable in tropical conditions
- Formulation not adapted for the available application equipment
- Quantities exceed the real need
- Pesticide is too dangerous for the users
- No label / in a foreign language
- Packaging of an inappropriate volume
- Packaging not strong enough

### **2) Basic principles**

- Promote IPM as the preferred approach for pest control
- Reinforce the management of pesticides by the host country
- Use good practices in the provision of pesticides

### **3) Constraints to IPM -- pesticides**

- Aggressive marketing of pesticides
- Policies of government/donors
- Governmental policies / donors promote the use of pesticides
- Economic/financial
- Institutional
- Centralized decision-making in favor of pesticides

### **4) Possible responses**

- Put in place a project/program for plant protection/vector control
- Put in place IPM/IVM projects/programs
- Donation/purchase of pesticides

### **5) Use of pesticides in development projects -- some recommendations if one is obliged to use pesticides.**

#### **Stage 1 – phytosanitary problem analysis**

- Is the pest biology known?
- Is the environment and are the farmer practices known?
- Is the pest impact known (financial loss)?

#### **Stage 2 – analysis of management options.**

- Has the pesticide efficacy been evaluated for the crop/pest and locality in question?
- Are agronomic/cultural measures known and applied?
- Is biological control possible?
- Has an IPM system been developed?

#### **Stage 3 – risk reduction**

- Risk = toxicity x exposure
- Minimize the risk of the pesticides used by:
  - Reducing toxicity of choices
  - Reducing the duration of exposure

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<sup>8</sup> Translated from Oct. 2000 presentation at IPM workshop by H. van der Walk, UNFAO Sahel Regional Program, Bamako, Mali.

- Reducing the degree of exposure

**6) Risk reduction measures:**

**Avoid use**

- Avoid pesticide use, if possible.
- Avoid pesticide use as the only control option, if possible.
- Integrate pesticide use into an IPM system -- minimize the frequency and dose of applications
- Use pesticides as a last resort

**Toxicity reduction**

- Use the least toxic commercial products available – basic principles:
- Products authorized? -- regulation
- Products efficacious? -- regulation / research
- Products acceptable to users? -- extension / farmers' groups
- WHO acute toxicity classes:
  - Ia      Extremely hazardous
  - Ib      Highly hazardous
  - II      Moderately hazardous
  - III     Slightly hazardous
  - U      Unlikely to present any acute hazard in normal use
- Lists of concern :
  - Products in WHO toxicity classes Ia, Ib (and II)
  - Products not registered in OECD countries
  - « PIC » or « POP » chemicals

(FAO: will not use Ia/Ib in development projects. World Bank / OECD: will not finance Ia/Ib/(II) if use is directly by or accessible to small farmers or in countries without good regulatory programs.)

**Exposure reduction**

- Prior to use
  - Transport, Packaging, Storage
- During use (« safer use »)
  - Training
  - Formulation
  - Equipment
  - Protective material
  - Buffer zones
- After use
  - Waiting period
  - Cleaning / bathing
  - Storage
  - Disposal
  - Monitoring