

## **Annex D**

### **Environmental Review and Compliance Information**

#### **I. Background on Regulation 216**

USAID's Environmental Procedures (known as 22 CFR 216 or Reg. 216) are meant to ensure that (1) the environmental consequences of USAID-funded activities are identified during the design and implementation stage, and that these consequences are considered prior to funding approvals and a decision to proceed with activity implementation; and (2) if possible, alternative activities are identified that preserve or restore the natural resource base upon which many of the beneficiary livelihoods depend. All IEEs should be reflective of the focus of the greater proposal on the development-relief approach to programming detailed in the P.L. 480 Program Policies and Proposal Interim Guidelines.

#### **II. Title II Compliance with Regulation 216: Executive Summary**

Compliance with USAID's Environmental Procedures (known as 22 CFR 216 or Reg. 216) is required of all Title II development activities and emergencies protracted beyond one year, whether they are supported by Section 202(e), ITSH or Development Assistance or other USAID funding. Refer to sections III-A through G below for further details on submission of the Initial Environmental Examination (IEE). Section V contains copies of USAID Title II environmental compliance forms and templates.

All Title II Multi-Year Assistance Program (MYAP) proposals and Single-Year Assistance Program (SYAP) proposals for emergencies protracted beyond one year must include an Initial Environmental Examination (IEE) or Request for Categorical Exclusion. If a CS's submission contains changes that require a proposal amendment, an IEE amendment should be submitted with the proposal amendment. Environmental Status Reports (ESRs) are required with the annual CSR4 submission.

Clearances for IEEs and IEE amendments should, when possible, be secured from the Mission Director prior to official submission to DCHA/FFP. All Title II draft Reg. 216 documentation must be cleared through the Mission and the Mission may request revisions to ensure that Mission objectives, consideration of local conditions, and consistency with environmental documentation of other CSs in the same country is achieved. Either the Mission Environmental Officer or Food for Peace Officer must sign the ESR face sheet, and cleared ESR copies must be sent to the DCHA/Bureau Environmental Officer (BEO) and DCHA FFP CBO for its official files.

For access to information, training opportunities related to Reg. 216 and Environmentally-Sound Design best practices CSs should consult [www.usaid.gov/our\\_work/environment/compliance](http://www.usaid.gov/our_work/environment/compliance).

Financial resources to support Reg. 216 training for CS staff should be included in the proposal of every operating budget.

### **LIST OF ACRONYMS**

BEO	Bureau Environmental Officer
CBO	Country Backstop Officer
CE	Categorical Exclusion
CFR	Code of Federal Regulations
CS	Cooperating Sponsor
CSR4	Cooperating Sponsor Results Report and Resource Request
DCHA	Democracy, Conflict, and Humanitarian Assistance
EA	Environmental Assessment
EDM	Environmental Documentation Manual
EMP	Environmental Management Plan
ENCAP	Environmental Capacity Building Program
EPTM	Environmental Procedures Training Manual
ER	Emergency Resources
ESF	Environmental Screening Forms
ESR	Environmental Status Report
FFP	Food For Peace
IEE	Initial Environmental Examination
MEO	Mission Environmental Officer
MYAP	Multi-Year Assistance Program
NER	Non-Emergency Resources
NGO	Non-governmental Organization
PEA	Programmatic Environmental Assessment
REA	Rapid Environmental Assessment
REO	Regional Environmental Officer
SYAP	Single-Year Assistance Program
USAID	United States Agency for International Development
WFP	World Food Program

### **III. Title II Compliance with Regulation 216: IEE Clearance and Submission Details**

#### **A. New Proposals (MYAPs & SYAPs)**

All MYAP proposals must include an IEE, which must be cleared by the Mission Director or his/her designate. All SYAP proposals need to include an IEE for slow-onset emergencies and emergencies protracted beyond one year, refer to section Annex D. III. E. below for details. To ensure proper alignment with Mission priorities, all IEEs must receive concurrence from the MEO or REO for non-presence countries. It should be noted that submission of IEEs without Mission signatures will likely delay the proposal processing. A review by the Geographic BEOs is useful but not required and would be facilitated by the DCHA/BEO as a professional courtesy.

The IEE is reviewed as a stand alone document, therefore the IEE face sheet, maps, and activity photographs should be submitted with the IEE, preferably as a single digital document. The IEE should not be a lengthy document. A clear and concise presentation including important activities, monitoring and mitigation strategies, environmental screening form, and associated maps and photos may be 10-20 pages in length. Longer documents are discouraged. If a proposal is submitted in adherence to these stipulations, every effort will be made for the IEE to be reviewed by the DCHA BEO in a matter of two weeks.

#### **B. MYAP Amendments**

All MYAP (or other) amendments must include an IEE amendment if a change has occurred from what was submitted in the original IEE. The same clearance process is followed as described above for MYAP proposals. If no change has occurred, the process as described below for CSR4s should be followed.

#### **C. CSR4 Submission**

If the IEE of the proposal was cleared without conditions or a categorical exclusion was granted, the CS should only state "No changes" in the Environmental Compliance section of the CSR4.

If the original proposal IEE contained “negative determination with conditions”, the CS should include, as an appendix to the CSR4, an ESR detailing the actions they have undertaken with regard to the previously approved IEE. The ESR is only required for years subsequent to the first year of the 1) MYAP proposal or 2) sequential SYAP submission (if any). In 2-10 pages, The ESR should detail the monitoring and evaluation measures (including process and/or impact indicators) being undertaken by the CS and indicate whether mitigation plans are on schedule or if unplanned impediments have occurred (see Section C.5 of the [USAID Environmental Procedures Training Manual AFR Edition](#),

([EPTM, 2002](#)) for the ESR “Facesheet” and “Instructions and Format”). For greater clarity, photographs displaying success or failure of mitigation measures are encouraged. The CSs should include a matrix, or table, in the ESR outlining that mitigation plans are being implemented as submitted in previous environmental documentation (i.e., the IEE or IEE amendment).

#### **D. Deferrals**

Deferrals are allowed but not encouraged. For those CSs who received a deferral on one or more activities of their program from the DCHA BEO, an amended IEE should be included with their following year's CSR4 to resolve each deferral or indicate that the activity will not be conducted, if that is the case.

#### **E. SYAPs**

In accordance with FFPIB 04-04 (May 2004), the “Reg. 216” Initial Environmental Evaluation (IEE) process must be invoked for persistent or complex emergencies lasting more than a year, unless a “categorical exclusion” is granted. During this one-year grace period, CS/NGOs are recommended to use the [Rapid Environmental Assessment \(REA\)](#) approach and the [Sphere Handbook \(2004\)](#) particularly where activities related to fuel wood consumption, agriculture, water/sanitation, and road rehabilitation activities are proposed. Consult the DCHA BEO for any scenarios not suitably addressed in this Annex.

#### **Points of Clarification:**

1. This policy applies only to programs implemented by CS/NGOs, not by the World Food Program (WFP). WFP environmental protection procedures are outlined in the policy paper [WFP and the Environment](#) (1998).
2. For unpredictable emergencies that also have a rapid onset (e.g. hurricane, conflict outbreak), the IEE is never required in the first year, i.e., a one-year grace period would be granted.
3. For more predictable a) slow onset (e.g. drought) and/or b) persistent, complex (e.g. rehabilitation, conflict) emergencies the IEE is required in the first year of the SYAP, if the CS has had a previous Title II program either in the country or in the region affected by the emergency. If the CS has not had an on-going or previous Title II program, then a one-year grace period would be granted.
4. For supporting emergency preparedness or transitory safety-nets, the IEE is required, unless a categorical exclusion is granted.
5. A statement signed by the CS is submitted with the SYAP proposal to designate that a “one-year grace period” is granted. The request form is found at Annex D., Section V.8.

#### **F. Environmental Screening Form**

As a means of clearly presenting potential impacts and mitigation strategies for a series of planned activities, an environmental screening form is highly recommended (EPTM, IEE Section 3, p. 4-13). This screening form may contain a list of activities, potential impacts, mitigation, monitoring (with suggested indicators), % Title II resources attributable to this single activity compared to the total resource for the project. A sample IEE using the screening form approach is found in the EPTM, Annex D.5. ESF templates are contained in this Annex (Table 1 & 2).

### **G. Monitoring and Evaluation**

If required by the IEE (e.g., activity is classified as a “Negative Determination with Conditions”), all activities in agriculture, natural resource/watershed management, water and sanitation, and/or physical infrastructure development should describe how the environmental impact will be monitored and viable indicators suggested. Also, discuss whether the environmental effects will be part of the project's overall monitoring and evaluation system, and if so, whether annual and impact indicators have been developed. Up to 10% budget is recommended for M&E of any environmental impacts of activities classified as “Negative Determination with Conditions”. An Environmental Management Plan (EMP) would specify how this environmental-impact M&E budget would adaptively manage the effectiveness of mitigation strategies for biophysical interventions that may have a negative impact on the environment (i.e. public health and/or ecological services). In the EPTM (March 2002), refer to Box 4.J for information on EMPs, an example EMP table is located in the EPTM Annex E.3.

### **IV. IEE Preparation Materials**

While taking precedence, these guidelines draw from existing documents which can be accessed at: [www.usaid.gov/our\\_work/environment/compliance](http://www.usaid.gov/our_work/environment/compliance).

For a short overview to the Reg. 216 process for Title II partners refer to [A Field Guide to USAID Environmental Compliance Procedures \(2000\)](#). More details for partners are found in the [USAID Environmental Procedures Training Manual AFR Edition, \(EPTM, 2002\)](#). A searchable database for IEEs is found on the Environmental Assessment Capacity Building Program ([ENCAP](#)) website supported by USAID’s Africa Bureau. Recommended best management practices are found in “[Environmental Guidelines for Small Scale Activities in Africa](#)”, Bureau for Africa, January 2005 and “[Environmental Guidelines for Development Activities in Latin America and the Caribbean](#)”, USAID, June 2002, Working Draft.

Additional sector-specific documentation including “[Low-Volume Roads Engineering: Best Management Practices Field Guide \(Keller and Sherar, 2003\)](#)”, “[Inorganic Fertilizer Use in Africa Environmental and Economic Dimensions](#)” , [USAID/AFR Guidance: Preparing PERSUAPs for pesticide programs in Africa](#) in as well as other sector-specific guidance can be found at the [ENCAP](#) website.

For rapid-onset and slow-onset emergencies, the [Rapid Environmental Assessment \(REA\)](#) can be used to minimize impact of relief to public health and the natural resource base. The

DCHA Bureau “[Guidelines for Emergency Environmental Management](#)” should be used to better prepare for emergency situations, cope while in progress, and reconstruct once the situation subsides. The need for a practical guide is well recognized and development of an “FFP Emergency Environmental Compliance Operations Guide” is under consideration. In addition to these documents, MEOs and BEOs, and REOs, should be consulted for program-specific feedback.

#### **V. Financial Resources to Support “Reg. 216” Training**

PVO Partners implementing Title II development and/or emergency programs are expected to ensure that their staff is sufficiently trained to meet the requirements of USAID regulations, such as 22 CFR 216. It is recommended that funds be allocated specifically in proposal budgets to support all training (under the training line item). USAID funds to support such training would arise from program P.L. 480 Title II funds (e.g., 202 (e), etc.) and Missions. Cost-sharing using PVO private resources is highly recommended, but not required. Consult with the FFP training coordinator for guidance in this area.

**V. Title II Environmental Compliance Forms and Templates  
(August 2005)**

**Templates for Use by USAID Bureau for Democracy, Conflict and Humanitarian  
Assistance DCHA/FFP Cooperating Sponsors**

- 1. Title II Environmental Compliance Facesheet**
- 2. Request for a Categorical Exclusion**
- 3. Outline of the IEE Narrative: Template**
- 4. Annotated IEE Narrative**
- 5. Environmental Status Report Facesheet**
- 6. Environmental Status Report Instructions and Format**
- 7. Environmental Screening Form Template**
- 8. SYAP IEE One-Year Grace Period Form**

# 1. Title II Environmental Compliance Facesheet

## TITLE II ENVIRONMENTAL COMPLIANCE FACESHEET

**Title of MYAP/SYAP/CSR4 Activity:**

**CS name/Country/Region:** \_\_\_\_\_

**Funding Period:** FY \_\_\_\_\_ - FY \_\_\_\_\_

**Resource Levels:** Commodities (dollar equivalent, incl. monetization):

\_\_\_\_\_ (NER) \_\_\_\_\_ (ER, if any)

Total metric tonnage request:

\_\_\_\_\_ (NER) \_\_\_\_\_ (ER, if any)

202(e) grant: \$ \_\_\_\_\_

**IEE Statement Prepared by:** Name \_\_\_\_\_

Date \_\_\_\_\_ Title \_\_\_\_\_

**IEE Amendment (Y/N)?** \_\_\_\_ **Date & Contact Person for Original IEE:**

\_\_\_\_\_ (Date) & \_\_\_\_\_ (Contact)

### **Environmental Media and/or Human Health Potentially Impacted**

(check all that apply):

*air* \_\_\_\_ *water* \_\_\_\_ *land* \_\_\_\_ *biodiversity (specify)* \_\_\_\_\_ *human health* \_\_\_\_ *other* \_\_\_\_ *none* \_\_\_\_

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

\_\_\_\_\_ 1. *Request for Categorical Exclusion(s)*

\_\_\_\_\_ 2. *Initial Environmental Examination:*

For a Single IEE:

\_\_\_\_\_ *Negative Determination:* no significant adverse effects expected regarding the proposed activities, which are well defined over life of the proposal.



- \_\_\_\_\_ *without conditions* (ideal conditions, no special mitigation measures needed, normal good practices and engineering will be used)
- \_\_\_\_\_ *with conditions* (non-ideal conditions, special mitigation measures specified to prevent unintended impact)

For an Umbrella IEE:

\_\_\_\_\_ *Negative Determination:* no significant adverse effects expected, but multiple sites and sub grant activities are involved that are not yet fully defined or designed. Refer to “Umbrella IEEs and Subgrant Environmental Screening” in the EPTM (March 2002), Annex G.

\_\_\_\_\_ conditions agreed to among Umbrella partners regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring.

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

\_\_\_\_\_ EA to be / being / has been (circle one) conducted. Note that the activities affected cannot go forward until the EA is approved.

\_\_\_\_\_ *Deferral:* one or more elements not yet sufficiently defined to perform environmental analysis; activities will not be implemented until amended IEE is approved.

Briefly describe the nature of the deferred activities below:

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**Summary of Findings:**

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

**USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:**

**Clearance:**

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

Food For Peace Director: \_\_\_\_\_ Date: \_\_\_\_\_

**Concurrence:**

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

Approved: \_\_\_\_\_

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

**Optional Clearances:**

FFP Officer: \_\_\_\_\_ Date: \_\_\_\_\_

Mission Food For Peace Officer: \_\_\_\_\_ Date: \_\_\_\_\_

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

Regional Environmental Officer: \_\_\_\_\_ Date: \_\_\_\_\_

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

General Counsel: \_\_\_\_\_ Date: \_\_\_\_\_

## **2. Request for a Categorical Exclusion:**

### **REQUEST FOR A CATEGORICAL EXCLUSION**

#### **1. Background and Activity Description**

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

#### **2. Justification for Categorical Exclusion Request**

Refer to appropriate guidance from Reg. 216, especially 22 CFR 216.2(c)

### **3. Outline of the IEE Narrative: Template**

#### **INITIAL ENVIRONMENTAL EXAMINATION**

##### **Program/Project Data:**

MYAP/SYAP Program/Activity:

CS Name, Country/Region:

- 1. BACKGROUND AND ACTIVITY DESCRIPTION**
  - 1.1 Background**
  - 1.2 Description of Activities**
  - 1.3 Purpose and Scope of IEE**
  
- 2. COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)**
  - 2.1 Locations Affected**
  - 2.2 National Environmental Policies and Procedures (of host country both for environmental assessment and pertaining to the sector)**
  
- 3. EVALUATION OF ACTIVITY/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL**
  
- 4. RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)**
  - 4.1 Recommended IEE Determination**
  - 4.2 Mitigation, Monitoring, and Evaluation**

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

  - 4.1 Recommended Planning Approach**
  - 4.2 Environmental Screening and Review Process**
  - 4.3 Promotion of Environmental Review and Capacity Building Procedures**
  - 4.4 Environmental Responsibilities**
  - 4.5 Mitigation, Monitoring, and Evaluation**
  
- 5. SUMMARY OF FINDINGS**
  - 5.1 Environmental Determinations**
  - 5.2 Conditions**

## 4. Annotated IEE Narrative

### INITIAL ENVIRONMENTAL EXAMINATION

#### **Program/Project Data:**

MYAP/SYAP Program/Activity:

CS Name, Country/Region:

The following narrative should be organized around the major activity sub-headings, if the activity categories are rather distinct, e.g., road construction, agricultural development, and irrigation works. As in sample IEEs (EPTM, Annex D.3 & D.4), treat each major activity under each section. Alternatively, one could organize by activity and then each major heading would cover the Sections 1 to 4. The summary in Section 5 is to cover all categories addressed, with an overview of the summaries at the end.

**If you are preparing an “Umbrella” IEE, please refer to EPTM Annex D.5 for the detailed description of what the outline might include.**

#### **1.0 BACKGROUND AND ACTIVITY DESCRIPTION**

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

#### **2.0 COUNTRY AND ENVIRONMENTAL INFORMATION**

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

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

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

### **3.0 EVALUATION OF ACTIVITY/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL**

This section of the IEE is intended to define all potential environmental impacts of the activity or project, whether they be considered direct, indirect, beneficial, undesired, short-term, long-term, or cumulative. Be clear and concise in the organization of this section.

### **4.0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)**

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

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

### **5.0 SUMMARY OF FINDINGS**

This should summarize the proposed environmental determinations and recommendations.

## 5. Environmental Status Report Facesheet

### TITLE II ENVIRONMENTAL STATUS REPORT FACESHEET

Title of MYAP/SYAP Activity:

CS name/Country/Region:

Funding Period: FY\_\_\_\_\_ - FY\_\_\_\_\_

**Resource Levels:**

Commodities (dollar equivalent, incl. monetization): \_\_\_\_\_

Total metric tonnage request: \_\_\_\_\_

Status Report Prepared by: Name: \_\_\_\_\_ Title \_\_\_\_\_  
Date: \_\_\_\_\_

Date of Previous Status Report: \_\_\_\_\_

#### A. Status of the IEE/Categorical Exclusion/EA

IEE Reference: Date of most recent IEE or Categorical Exclusion (If all activities were CEs): \_\_\_\_\_, Contact Person: \_\_\_\_\_

\_\_\_\_\_ **No revisions** or modifications needed. IEE/CE or CE and all activities still applicable

\_\_\_\_\_ **Amended IEE** submitted, based on attached report, summary, etc., (referencing the body).

\_\_\_\_\_ **EA/PEA** needs to be amended to cover additional or modified activities. [Note: If yes, immediately notify the MEO, REO (where one exists) or the DCHA BEO. Amended EA or PEA submitted, based on \_\_\_\_\_]

#### B. Status of Fulfilling Conditions in the IEE, including Mitigative Measures and Monitoring

\_\_\_\_\_ Environmental Status Report describing compliance measures taken is attached.

\_\_\_\_\_ For any condition that cannot be satisfied, a course of remedial action has been provided within an IEE Amendment. [Note: For conditions under an EA, consult the MEO, REO (where one exists) and/or BEO].

**USAID APPROVAL OF ENVIRONMENTAL STATUS REPORT:  
Clearance:**

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

Food For Peace Officer: \_\_\_\_\_ Date: \_\_\_\_\_

\*or USAID Environmental Representative, if MEO does not exist.



## **6. ENVIRONMENTAL STATUS REPORT (ESR) REPORT INSTRUCTIONS AND FORMAT**

In 2-10 pages or less, the Environmental Status Report should indicate whether steps need to be taken to amend previous environmental documentation and whether conditions are being met, e.g., mitigation plans are on schedule and the monitoring and evaluation measures being undertaken by the Cooperating Sponsor. In a Mission's comments and/or approval cable to DCHA/FFP, the Mission should state whether it concurs with the Environmental Status Report.

### **Section A. Status of the IEE/Categorical Exclusion/EA**

Use the answers to the following questions to determine if the status of the IEE has changed.

Use the same instructions for a Categorical Exclusion submission in the event all CS activities were Categorical Exclusions.

If any activities are covered under an Environmental Assessment (EA) which is typically activity or site-specific or a broader sectoral, thematic or geographic Programmatic Environmental Assessment (PEA), the questions below need to be interpreted in the context of the specific activity, sector or area.

#### **A1. Modified or New Activities:**

Have new activities been added or activities substantially modified?

Note what these are and reference an amended IEE, if the MYAP or SYAP has an approved IEE. Reference a Categorical Exclusion Document in the event the MYAP or SYAP required only a Categorical Exclusion Document **and** the new/modified activities are also categorically excluded. If they are not, a full IEE will need to be prepared.

Note: An amended MYAP or SYAP requires an IEE Amendment. Also remember that activities can be changed or added that do not require a MYAP/SYAP amendment, but which do alter Reg. 216 threshold decisions and would thus require an IEE Amendment.

#### **A2. Resolution of Deferrals:**

Did the previous IEE have deferrals? List these.

State if they are being resolved through an amended IEE to be submitted with this year's activity. If not, indicate when an amended IEE will be submitted in order to be able to go ahead with the activities.

If the deferred activities have been dropped from the sponsor's program, amend the current IEE to state that and recommend to the BEO that the deferral is no longer applicable.

**A3. Conditions:**

If experience has shown that conditions in the IEE cannot be complied with, note and reference an amended IEE, which discusses what substitute conditions are recommended in order to comply with the spirit of the original conditions (to avoid or reduce environmental effects).

Many conditions in IEEs relate to **Mitigation and Monitoring**. If based on Section B2 below, it proved not feasible to carry out all mitigation and monitoring and the sponsor desires to change the conditions for mitigation and monitoring spelled out in the IEE, discuss and reference an amended IEE.

**A4. Amendments:**

Based on the above, is an amended IEE needed?

Yes (If yes, attach here.)  No

If the previous documentation was a Categorical Exclusion Submission, is an amended Categorical Exclusion needed to deal with new Categorical Exclusions for new activities?

Yes (If yes, attach here.)  No  Not Applicable

Is the Sponsor unable to meet recommendations and/or conditions that are part of an EA or does the Sponsor believe an EA or PEA needs to be amended to cover additional or modified activities?

Yes  No  Not Applicable

If yes, immediately notify the MEO, REO (where available) or the DCHA BEO.

**A5.** Remember it is necessary to obtain the Mission's concurrence on an Environmental Status Report prior to proposal approval. Be sure to complete the ESR Facesheet. Proceed to Section B.

## **Section B. Status of Fulfilling Conditions in the IEE, including Mitigative Measures and Monitoring**

Take this opportunity to re-evaluate your mitigation and monitoring plan. Make sure the commitments made in the IEE are doable and realistic, in other words, not beyond the capabilities and resources of the CS to implement. Mitigation and monitoring can be part of normal visits to an area to check on activities, unless specific testing, surveys or the like have been required. Alternatively, experience to date may indicate that the IEE's mitigation and monitoring plan is not sufficiently specific or is lacking in some respect. If conditions or mitigation and monitoring are part of an activity-specific EA or sectoral PEA, the instructions below still apply.

- B1.** For each component of the program, list or reproduce (as an Annex to this report) the mitigative measures and monitoring or other conditions. [For activities placed under an umbrella process according to EPTM Annex G, do not reproduce the standard Environmental Screening Form and Review conditions; follow instructions at B3 below.]
- B2.** Describe status of complying with the conditions. Examples of the types of questions a Sponsor should answer to describe "status" follow.
- 1) What mitigative measures have been put in place? How is the successfulness of mitigative measures being determined? If they are not working, why not? What adjustments need to be made?
  - 2) What is being monitored, how frequently and where, and what action is being taken (as needed) based on the results of the monitoring? In some situations, a CS will need to note that the monitoring program is still being developed with intent to satisfy the conditions. Alternatively, it could happen that the conditions cannot be achieved because of various impediments.

Sponsors are encouraged to construct table(s) of relevant status indicators.

**For any conditions that cannot be satisfied, propose a course of remedial action and amend the IEE.** In the case of an EA, consult the MEO, REO (where available), and the DCHA BEO, as amending an EA is a more elaborate process.

- B3.** If the CS is using Environmental Screening Forms\* (ESFs) and environmental reviews, prepare: i) a table listing the ESFs prepared and submitted; ii) the Category(ies) the activity(ies) was/were placed in; and iii) whether the ESF has been approved by the MEO. For any Category 2 or above activities, the chart should include the status of the Environmental Reviews, e.g., in preparation; submitted to MEO; approved by MEO; MEO

referred to REO and BEO; and the date of approval by MEO or by REO or BEO, if appropriate.

**Section C. Cooperating Sponsor Recommendations for Beyond Compliance and Institutionalization of Environmentally Sound Practices**

Please outline plans or recommendations (in a page or less) for institutionalizing environmentally sound design and management practices in future activities of a similar nature.

## 7. ENVIRONMENTAL SCREENING FORM TEMPLATES

**Table 1: Mitigation, Monitoring and Evaluation of Negative Determination with Conditions Activities**

Activity	Sub-Activity	Potential Environmental Impact and Causes	Mitigation Measures	Monitoring (Suggest Indicators)	Monitoring Frequency	Responsibility

**Table 2: Synopsis of the Environmental Decisions**

<b>Activity</b>	<b>Geographic Distribution Division/District</b>	<b>Scale and Quantity [Provide Detail]</b>	<b>Unit e.g. ha, [&gt; 1 unit possible]</b>	<b>% Title II Resources</b>	<b>Expected IEE Determination</b>	<b>Reg. 216 Citation</b>
<b><i>Sub total</i></b>						
<b><i>Total</i></b>						

% Title II Resources = Proportion of total Title II resources apportioned to the line items for particular activity.

## 8. Title II SYAP IEE One-Year Grace Period Form

### TITLE II REQUEST FOR SYAP IEE ONE-YEAR GRACE PERIOD

**Title of SYAP Activity:**

**CS name/Country/Region:**

**Emergency or Program:**

**Funding Period:** FY \_\_\_\_\_ - FY \_\_\_\_\_

**Resource Levels:**

Commodities (dollar equivalent, incl. monetization): \_\_\_\_\_

Total metric tonnage request: \_\_\_\_\_

As noted in the P.L. 480 Program Policies and Proposal Interim Guidelines, Annex D., Section III. E, Environmental Review and Compliance Information, we, \_\_\_\_\_ (*CS Name*), acknowledge that for the one-year grace period granted by USAID FFP, we are not required to submit the 22 CFR 216 Initial Environmental Examination (IEE) to review the potential environmental impacts of our SYAP relief intervention pertaining to the \_\_\_\_\_ (*Emergency Name*) in \_\_\_\_\_ (*Country/Region*).

We, \_\_\_\_\_ (*CS Name*), understand that if we are funded for a follow-on SYAP for the specified emergency, we are then responsible for demonstrating that our relief interventions will not cause unintended harm to the natural resource or human health environment by submitting an IEE for clearance by USAID. We, \_\_\_\_\_ (*CS Name*), are aware of the recommendation to use the Rapid Environmental Assessment (REA) approach and the Sphere Handbook to optimize the effectiveness of the USAID investment during this first year of the relief intervention.