

# Annex G: Umbrella IEEs for “Umbrella” Projects

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## ***G.1 Umbrella projects and USAID’s Environmental Procedures***

The basic procedures described in Chapters 1–4 of this manual assume that proposed activities are sufficiently well-defined that the screening process can be undertaken and, if necessary, an IEE can be prepared.

However, proposals often include activities that are *not* fully defined at the time the proposal is submitted. “Umbrella projects” are a common example of this situation. In an umbrella project, a number of small-scale activities are funded through subgrants under a larger project.

Umbrella projects are commonly used to implement community-driven development schemes. They provide a mechanism to fund community proposals for small-scale activities. They may also be used to fund micro and small enterprise subprojects.

Typically, a USAID partner organization receives overall funding for the umbrella project. The partner then functions as a subsidiary grantmaker, using a portion of the overall funding to award small-scale grants.

Under certain circumstances, however, USAID itself assumes the role of managing the subproject proposal and grant-making process.

In either case, the basic situation is the same: the project includes a large number of activities that are not well-defined at the time of the initial design and proposal. Under USAID’s Environmental Procedures as described in Chapters 1–4, all such “yet to be defined” activities must be deferred because insufficient information is available to write the IEE. And under a deferral, funds cannot be committed or expended.

Attempting to implement an umbrella projects using IEE deferrals would be difficult. Under a deferral, the IEE would need to be amended and re-approved as each sub-activity was developed. Each amendment would require approval by the USAID Bureau Environmental Officer in Washington. This would time-consuming, make the IEE so long as to unmanageable, and impose an impossible workload on USAID’s Washington Bureaus.

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## ***G.2 The “Umbrella IEE” for umbrella projects***

The “Umbrella IEE” offers an alternative to the deferral. It permits projects with (1) a large number of activities that are (2) not-well-defined at the time

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***An Umbrella IEE is only appropriate if:***

- *the proposal consists of multiple activities;*
  - *most of the activities are small-scale but not yet fully designed; and*
  - *an environmental review process can be designed that will review activities as they are designed, and substantially satisfy the requirements of Reg. 216.*
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### **Umbrella IEE and rural roads activities**

One particularly useful application of the “umbrella” and the ESF is with small-scale road building and repair.

A special ESF has been adapted from USAID/Tanzania, USAID/Uganda, USAID/Mozambique, USAID/Madagascar, and USAID/Cambodia-approved rural road environmental criteria.

It requires that Partners, local partners, and on-site road engineer(s) be trained to use the criteria to conduct Environmental Reviews (ER).

Annex D contains an example of an umbrella IEE applied to roads activities.

of the proposal to be implemented in an expeditious manner while maintaining compliance with Reg. 216.

The umbrella IEE process functions as follows:

- A *negative determination with conditions* is requested for the small-scale, yet-to-be-determined subgrant activities contained in the project proposal.<sup>22</sup>
- The key condition is that a streamlined or simplified environmental review process is created for and applied to the proposed small-scale sub-activities.

This subsidiary environmental review process is applied to these small-scale activities *as they are defined* (i.e., when design and siting decision are being made).

Although simplified, this process must substantially satisfy the requirements of Reg. 216. However, most environmental review documentation is approved by the partner or the mission, not at the BEO level. BEO approval is only required when the subproject environmental review identifies activities high-risk activities or activities with significant potential for adverse impacts.

As with the Reg. 216 process, an activity cannot be implemented until the subsidiary screening and review process is complete, and the documentation has been approved.

The *existence and application* of the subsidiary environmental review process is one condition of the IEE. Other conditions include:

- Demonstrated PVO capacity to carry out environmental reviews (e.g., staff may be required to complete environmental compliance training),
- Applying environmental best practice to planning and design,
- Conducting monitoring and mitigation as appropriate, and
- Reporting on the status of environmental compliance as required or requested.

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## ***G.3 How is the subsidiary environmental review process established?***

The subsidiary environmental review (ER) process established by an umbrella IEE is set out in an *Environmental Review Form (ERF) and accompanying instructions for its completion*.

The ERF instructions guide users through the subsidiary screening, review and mitigation process for each set of activities as they are designed. The

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<sup>22</sup> An IEE can contain both umbrella and non-umbrella elements. See box.

ERF and the ERF instructions are normally an integral attachment to the approved IEE.

There is no single model of an ERF. The examples presented in the attachments to this annex are meant to be specifically tailored for the requirements of a particular set of activities and a particular national or regional context.

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## ***G.4 Who has the power to approve environmental documentation of sub-activities?***

Umbrella IEEs are most frequently used when a partner organization receives overall funding for an “umbrella project” that includes a sub-granting process. The Partner organization then functions as a grantmaker, reviewing proposals submitted by communities, local government or other PVOs/NGOs.

Under each umbrella IEE, the respective Mission and Partner will determine what level of sub-activity review and approval will be carried out by the USAID Mission, if any. (As with all IEEs, the concurrence of the BEO is also required for the governing IEE.) The Partner should discuss approval requirements with the Mission when considering an “umbrella” IEE.

Approval of the “umbrella” IEE means that, in most cases, approval of the subsequent environmental reviews (for specific activities or generic sets of activities) is by the Partner or Mission. USAID/Washington concurrence is typically NOT required. The exception is if a proposed activity is high risk or appears likely to result in significant adverse impacts and the need for an Environmental Assessment.

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## ***G.5 Attachments***

This Annex contains the following attachments

Attachment 1: Template and Guidance for Writing an Umbrella IEE

Attachment 2a: Explanation of the Sample Environmental Review Form (ERF) and ERF Instructions

Attachment 2b: Sample Environmental Review Form (ERF) and ERF Instructions AND

Sample Supplemental Screening Questions for Natural Resource Management Activities

Attachment 3a: Explanation of the 2<sup>nd</sup> Sample Environmental Review Form (ERF)

Attachment 3b: 2<sup>nd</sup> Sample Environmental Review Form—the “Environmental Screening & Report Form for NGO/PVO Activities and Grant Proposals”



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## **Attachment 1 to Annex G: Template and Guidance for Writing an Umbrella IEE**

Because an umbrella IEE or IEE component addresses activities for which specific information is not available, standardized umbrella IEE language can often be used.

This section provides general guidance and suggested language for an umbrella IEE. It assumes that the project involves subgrants by the lead partner (the proposing organization) to sub-recipients. It provides section-by-section advice on writing such an umbrella IEE around the basic IEE outline.

Note: This section *supplements* the basic concepts set out in Chapter 4, “Writing the IEE.” Note also **that a sample umbrella IEE is provided in Annex D.**

If you are using the subgrant review process as one component within a larger IEE, the template below will require appropriate modification.

### **IEE Section 1: Background and Project Description**

<b>General guidance</b>	<b>Model language</b>
<p><b>1.1 Background</b></p> <p>State the reasons why proposed activities are not well-defined.</p> <p>(For example, because activities will be in response to participant generated needs and proposals.)</p>	
<p><b>1.2 Description of Activities</b></p> <p>Indicate the types of activities that are likely.</p> <p>Describe the planned funding levels of the activities.</p> <p>Describe disbursement and implementation arrangements, including whether the activities are food for work, monetization or entail grants to communities or groups.</p> <p>Identify organizations involved in the activities and their roles.]</p> <p><b>1.3 Purpose and scope of IEE</b></p> <p>&lt;no special guidance&gt;</p>	

### **IEE Section 2: Country and Environmental Information**

<b>General guidance</b>	<b>Model language</b>
<p><b>2.1 Locations affected</b></p> <p>Briefly describe the environment of the location(s) in which the undefined activities will take place.</p> <p>Depending on the nature of the proposal, the locations</p>	

could include an entire country, several regions, scattered locations, or a specific region.

The environment includes physical, biological, health, socio-economic, and cultural aspects. Indicate general environmental issues and trends.

However, because not all locations for future interventions have been identified and because of the variety of environmental situations that might be encountered, this section of the IEE can be neither comprehensive nor detailed

## 2.2 National Environmental Policies and Procedures

<no special guidance>

### IEE Section 3: Evaluation of Project/Program Issues with Respect to Environmental Impact Potential

General guidance	Model language
<p>To the extent that you have information, describe the generic kinds of environmental impacts associated with each activity or type of activity.</p> <p>Note whether there are features of the general environment that make it more likely (or less likely) that such impacts are significant.</p> <p>Take care to assess potential cumulative impacts where a number of activities are to be carried out in close proximity to each other or will add to the impacts of other public or private sector activities.</p>	<p>If your knowledge of potential environmental impacts is limited, insert the following or similar wording:</p> <p><i>The physical and topographic conditions, climate, soils, and ecosystems as well as social and economic characteristics that could be encountered are quite variable.</i></p> <p><i>Because the specific characteristics and locations of these activities are not definitive, the potential for adverse environmental impacts cannot be excluded until additional information about project design and location becomes available.</i></p> <p><i>Therefore, each proposed activity will require environmental review as it is defined. This review will determine the specific nature and magnitude of potential impacts. The activities to be proposed share the common characteristic of being small in scale.</i></p>

### IEE Section 4: Recommended Determinations and Mitigation Actions (Including Monitoring and Evaluation)

In comparing the internal organization of an “umbrella IEE” with that of a “classic” IEE, it is Section 4 which differs most strongly. Under Section 4 of an umbrella IEE, the proposing organization and USAID commit to following specific procedures for screening, post-IEE environmental reviews, mitigation, and monitoring (see Figure G.1). The proposing organization and USAID also commit to promoting environmental assessment capacity building for their staff and partners.<sup>23</sup>

<sup>23</sup> The relationship between the Partner(s) and USAID may differ from that characterized herein. **The sample language should be adapted to the situation at hand.**

General guidance	Model language
<p><b>4.1 Mitigation actions and conditions</b></p>	<p>The intent of the mitigation actions and conditions detailed in this section is to assure that no subgrant activities with significant, adverse environmental impacts are implemented under this project:</p>
<p><b>4.1a Environmental Screening and Review Procedures</b></p> <p>This section describes the subgrant environmental review procedures that will be used by the project.</p> <p>Note: The model language provided assumes that the ENVIRONMENTAL REVIEW FORM provided in this Annex is used.</p>	<p>Environmental screening and review procedures will be adopted for all subgrant activities not defined at the time of the proposal.</p> <p>These procedures are set out in the attached draft Environmental Review Form and accompanying Environmental Review Form instructions. <b>[PROPOSING ORGANIZATION]</b> will prepare or cause to be prepared the appropriate documentation for each activity.</p> <p>Under these procedures, each activity in a subgrant will result in one of three screening results:</p> <ul style="list-style-type: none"> <li>▪ Very low risk</li> <li>▪ Moderate or unknown risk</li> <li>▪ High-risk</li> </ul> <p>Activities found to be (1) high risk or (2) moderate/unknown risk will require completion of an environmental review. For each activity, the environmental review will result in one of three possible recommended determinations:</p> <ul style="list-style-type: none"> <li>▪ No significant adverse impacts</li> <li>▪ No significant adverse impacts given specified mitigation and monitoring</li> <li>▪ Significant adverse impacts</li> </ul> <p>Final review and clearance authority for the environmental documentation form will lie with the Mission Environmental Officer (MEO), with two exceptions:</p> <ul style="list-style-type: none"> <li>▪ The environmental reviews and recommended determinations for any “high risk” activities will require clearance by the <b>[Regional Environmental Officer (REO) (if one exists)]</b> and the Bureau Environmental Officer (BEO).</li> <li>▪ Recommended determinations indicating “significant adverse impacts” will incur Regulation 216 (22 CFR 216) requirements for the conduct of an Environmental Assessment.</li> </ul> <p>No subgrant funds will be awarded until environmental documentation for the subgrant activity has undergone final review and clearance.</p> <p>This clearance is granted on the condition that all mitigation and monitoring measures specified in the environmental review are binding requirements.</p> <p>The attached Environmental Review form is a draft. USAID/<b>[COUNTRY]</b> will facilitate the refinement of this form with <b>[PROPOSING ORGANIZATION]</b> [, <b>the REO, if one exists]</b> and the BEO to meet project needs.</p>

General guidance	Model language
<p><b>4.1b Capacity-building for Environmental Review</b></p> <p>The proposing organization should provide evidence that it has, or will acquire, sufficient capacity to complete the environmental screening and review process, and to implement mitigation and monitoring measures.</p> <p>Capacity can be developed through a training program, such as USAID’s ENCAP Environmental Assessment and Environmentally Sound Design Course (<a href="http://www.encapafrika.org">www.encapafrika.org</a>).</p> <p>If partner organizations will be proposing and implementing subgrant activities, they too, must have sufficient capacity to fulfill the environmental screening and review requirements.</p>	
<p><b>4.1c Adherence to environmentally sound design principles</b></p> <p>The proposing organization must certify that it and its partners will follow environmentally sound design best practice in designing and implementing their activities, and in designing mitigation and monitoring measures.</p> <p>Refer to the sources of guidance or expertise that will be used, including USAID’s <i>Environmental Guidelines for Small-Scale Activities in Africa</i>.</p>	<p>Proposing organizations and their partners will certify they are following environmentally sound design principles and best management practice in designing their activities. Guidance consulted shall include:</p> <ul style="list-style-type: none"> <li>• USAID’s <i>Environmental Guidelines for Small-Scale Activities in Africa (2003)</i> (See <a href="http://www.encapafrika.org">www.encapafrika.org</a>)</li> <li>• <b><u>[Other appropriate project or sector-specific design or BMP resource guides]</u></b></li> </ul>
<p><b>4.1d Environmental Monitoring &amp; Evaluation</b></p>	<p>Mitigation and monitoring measures specified in the environmental reviews submitted under procedures described in 4.1a are binding requirements. <b>[PROPOSING ORGANIZATION]</b> shall assure that these measures are implemented.</p> <p>All periodic reports of the implementing partner to <b>[USAID Country Mission]</b> shall contain an environmental section. This section shall summarize:</p> <ul style="list-style-type: none"> <li>▪ The state of implementation of environmental mitigation and monitoring measures</li> <li>▪ Results of environmental monitoring and any unexpected impacts,</li> <li>▪ The success or failure of mitigation measures being implemented,</li> <li>▪ Any major modifications/revisions to the project, mitigative measures or monitoring procedures.</li> </ul> <p><b>[USAID Country Mission]</b>’s MEO and the Project Manager will be ultimately responsible for monitoring environmental impacts of all project-financed activities. This may include:</p> <ul style="list-style-type: none"> <li>▪ monitoring and evaluation of activities after implementation for unforeseen environmental impacts that may need to be mitigated. This process should be integrated into Mission field visits and consultations with <b>[proposing organization]</b></li> </ul>



General guidance	Model language
	<ul style="list-style-type: none"> <li>▪ review of the implementing partner’s reports with respect to results of environmental mitigation and monitoring procedures;</li> <li>▪ reporting on implementation of mitigation and monitoring requirements as part of the summary of activities and their status that is passed to the <b>[REO: Insert if one exists]</b> and BEO; and</li> <li>▪ recommended adjustments to subproject budgets to address additional mitigation or monitoring needs incorporated in subproject workplans</li> </ul> <p>Periodic visits of the <b>[REO: if one exists]</b> or BEO may also be requested for advice, refresher training, and confirmation that environmental processes are in place.</p>
<p><b>4.1e Adherence to national environmental laws and regulations</b></p> <p>The IEE should specifically acknowledge that the environmental screening and review procedures described in 4.1a do not substitute for the environmental laws and policies of the host country.</p> <p>If national laws and policies may impose environmental review requirements on likely subgrant projects, these requirements should be noted, and the proposing organization should provide assurance that these national requirements will be followed.</p> <p>Towards this end, review and revision of the Environmental Review Form should include elements that will allow the proposing organization to determine whether national environmental review requirements will apply.</p>	
<p><b>4.1f Adherence to USAID pesticide procedures</b></p> <p>The environmental screening and review procedures summarized in section 4.1a do not apply to pesticide procurement, use, transport, storage or disposal.</p> <p>The proposing organization should specifically certify:</p> <ul style="list-style-type: none"> <li>▪ that none of the funded subgrant activities will involve pesticides, OR</li> <li>▪ that a separate Pesticide Evaluation Report and Safe-Use Action Plan (PERSUAP) has been prepared and approved pursuant to USAID Regulation 22 CFR 216.3 (b) (1) (i) (a-l).</li> </ul> <p>See PERSUAP examples at <a href="http://www.encapafrika.org">www.encapafrika.org</a> and <a href="http://www.foodaidmanagement.org">www.foodaidmanagement.org</a></p>	<p>This IEE does not cover pesticides or other activities involving procurement, use, transport, storage or disposal of toxic materials.</p> <p>Except as noted in the attached “Environmental Review Form,” any pesticide activities will require an amended IEE.</p>
<p><b>4.2 Recommended Determinations</b></p>	

General guidance	Model language
<p>This section asserts that subgrant activities not yet defined merit a “NEGATIVE DETERMINATION WITH CONDITIONS.”</p> <p>These conditions are all the measures detailed in section 4.1</p>	<p>This Initial Environmental Examination (IEE) satisfies the conditions of the environmental procedures for umbrella activities and delegation of environmental review responsibility to Missions for PVO/NGO umbrella-type projects (Cable 95 STATE 257896).</p> <p>The following determinations are recommended:</p> <p><b>1. A Categorical Exclusion</b> is recommended for project-financed technical assistance, training and education, institutional strengthening, and information exchange activities that include no physical interventions and no direct effects on the environment.</p> <p>This determination is recommended pursuant to 22 CFR 216.2(c)(1)(i) and 216.2(c)(2)(i), (iii) and (v) <b>[Insert other citations if applicable]</b>. The Environmental Review Instructions and Form will be used to confirm this determination for each activity.</p> <p>Exceptions:</p> <ul style="list-style-type: none"> <li>▪ This categorical exclusion does not apply to education, technical assistance, or training if such includes activities directly affecting the environment, such as construction of facilities, per 216.2(c)(2)(i),</li> <li>▪ This categorical exclusion likewise does not apply to studies, projects, or programs intended to develop the capability of recipient countries to engage in development planning when designed to result in activities directly affecting the environment, per 216.2(c)(2)(xiv).</li> </ul> <p><b>2. A Negative Determination with Conditions</b> is recommended for all other subgrant activities not yet defined in detail.</p> <p>This IEE specifies a set of measures (section 4.1 above) to ensure adequate environmental review of USAID-supported activities, and to assure that no subgrant activity with significant adverse environmental impacts will be implemented under this IEE.</p> <p>This determination is recommended with the explicit commitment and understanding that ALL measures set out in 4.1 constitute binding requirements and will be implemented in full.</p>
<p><b>5.0 Summary of findings</b></p> <p>This section should contain a <i>summary table</i> listing each activity against its recommended determination.</p> <p>Within the summary table or below it, the CONDITIONS on which the negative determination for subgrant activities depends should be listed.</p> <p>These conditions are:</p> <ul style="list-style-type: none"> <li>▪ Implementation of environmental screening and review procedures for subgrants, as set out in 4.1a and the attached Environmental Review Form and Instructions</li> <li>▪ Capacity-building for environmental review (4.1b)</li> </ul>	

General guidance	Model language
<ul style="list-style-type: none"> <li>▪ Adherence to environmentally sound design principles in subgrant projects (4.1c)</li> <li>▪ Appropriate environmental mitigation and monitoring for subgrant projects (4.1d)</li> <li>▪ Adherence to host country environmental laws and policies (4.1e)</li> <li>▪ Adherence to USAID pesticide procedures (4.1f)</li> </ul>	



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## Attachment 2a to Annex G

### ***Explanation of the Sample Environmental Review Form (ERF) and ERF Instructions***

The Environmental Review Form (ERF) and the ERF Instructions guide applicants through a simplified EIA process compatible with Regulation 216.

The ERF and the ERF Instructions immediately follow this explanatory text.

This documentation describes the logic behind the form and the environmental screening and review process it creates for activities carried out under umbrella projects. This information is summarized in figure G.1.

**NOTE:** As stated in the box on the first page of the ERF Instructions, both ERF and the ERF Instructions should be *modified* for the requirements of particular projects and regions.

#### **Screening: the first step**

Under this ERF, applicants first **SCREEN** the proposed activities against a listing of designated “low risk” and “high risk” activities. Each proposed activity is then assigned to one of three categories, as described in the table below:

<b>Screening result</b>	<b>Basis</b>
Very low risk of significant adverse environmental impacts	Screening criteria are derived from Regulation 216 categorical exclusions. A complete list of such activities is provided in the ERF Instructions.
High risk	Screening criteria are derived from activities typically requiring an environmental assessment under Regulation 216, and from other statutes and directives. A complete list of such activities is provided in the ERF Instructions.
Moderate or unknown risk	Activities that are neither high-risk nor very low risk are designated “moderate or unknown risk.” Examples of such projects are provided in the form, but these examples are not exhaustive.

#### **NOTICE:**

THIS ERF AND ITS DOCUMENTATION ARE A **DISCUSSION DRAFT**.

THEY HAVE BEEN PREPARED FOR THE JOHANNESBURG MEO WORKSHOP IN FEBRUARY 2003 AND WILL BE REVISED BASED ON FEEDBACK FROM THIS EVENT.

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#### ***The sample Environmental Review Form:***

- *guides applicants through a simplified EIA process.*
  - *This process is compatible with Regulation 216.*
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## Use of supplemental screening forms

Supplemental screening questions may be developed for the needs of particular types of activities. These screening forms are used to more specifically identify very low-risk or very high-risk activities.

A sample supplemental screening form for *Natural Resource Management* (NRM) activities is provided here. A “NO” answer to ALL questions on this form indicates that a small-scale NRM activity can be considered “very low risk.” This supplemental form is referenced in the list of “very low risk” activities provided in the ERF Instructions.

## Screening outcomes determine the need for further review

For very low risk activities, no further environmental review is needed.

High Risk or moderate/unknown risk activities require completion of an *Environmental Review Report*. This is a typically short (2–3 page) document that resembles a simplified IEE.

Based on the *Environmental Review Report*, applicants provide one of three *Recommended Determinations*, detailed in the table below:

Recommended determination	Meaning
No significant adverse impacts	The activity in question will not result in significant, adverse environmental impacts. Special mitigation or monitoring is not required. Typically does not apply to high-risk activities.
No significant adverse impacts given specified mitigation and monitoring	With the mitigation and monitoring specified in the Environmental Review Report, none of the subgrant activities will result in significant, adverse environmental impacts.
Significant adverse impacts	One or more of the subgrant activities is likely to cause significant adverse environmental impacts and cannot be mitigated with best practices or other measures. A full environmental assessment will be required.

### Certifications

The applicant must certify that:

- Those responsible for implementing this activity have received training in environmental review AND training and/or documentation describing essential design elements and best practices for activities of this nature.
- These design elements and best practices will be followed in implementing this activity.
- Any specific mitigation or monitoring measures described in the environmental review will be implemented in their entirety.
- Compliance with these conditions will be regularly confirmed and documented by on-site inspections during the activity and at its completion.

### Certification

Regardless of screening outcomes or recommended determinations, applicants must sign a certification section.

The certification commits the applicant to the mitigation and monitoring measures specified in the environmental review, and to assuring that its staff and partners have the capacity to implement environmentally sound best practices. (See box on this page.)

## Approval

The USAID Mission is always the first reviewer of the ERF.

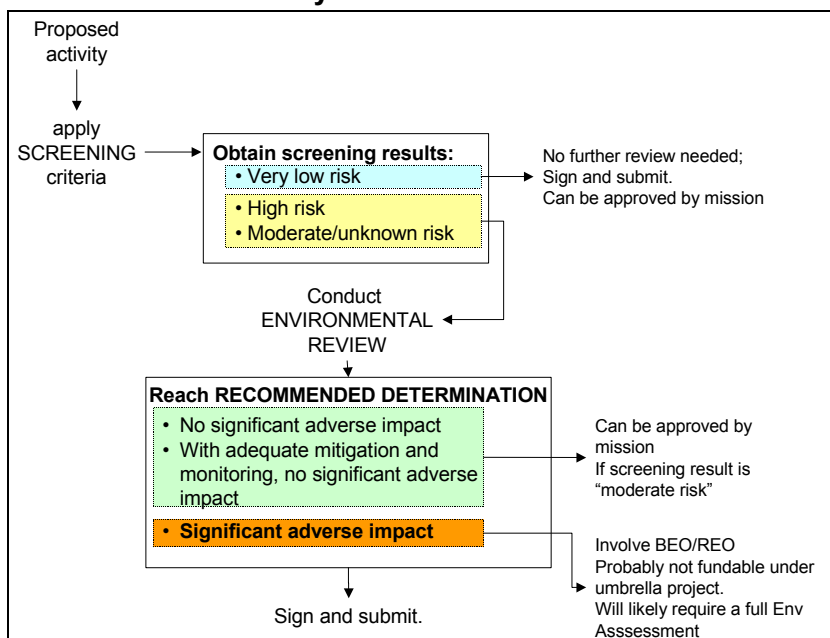
- When screening determines that ALL proposed activities are “Very Low Risk,” the Mission can approve the ERF without higher level approvals.
- In all other cases, approval authority depends on the combination of screening results and the recommended determination. See table below:

**Table G.1: Approval authority for the ERF**

Screening outcome ↓	Recommended Determination		
	No significant adverse impacts	No significant adverse impacts given specified mitigation and monitoring	Significant adverse impacts
Moderate or unknown risk*	MISSION*	MISSION*	REQUIRES EA. MISSION MUST INVOLVE REO/BEO
High Risk	Unlikely to be a proper determination MISSION + REO/BEO	MISSION + REO/BEO	REQUIRES EA. MISSION MUST INVOLVE REO/BEO

\*however, if the activity is of a new type, the mission should involve the BEO/REO.

**Figure G.1: Environmental Screening and Review Process created by the Environmental Review Form.**







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***Attachment 2b to Annex G***

***Sample Environmental Review Form (ERF) and  
ERF Instructions***

***Sample Supplemental Screening Questions for  
Natural Resource Management Activities***



**Note to individuals adapting this form for use on a particular project:**

- These instructions accompany the generic “Environmental Review Form.”
- The Environmental Review Form and these instructions are for use in the review and approval of subproject proposals that are (1) carried out under an “umbrella” project AND (2) defined and reviewed *after* approval of the overall or “umbrella project.” Typical subprojects include microfinance activities or subgrants for small-scale development
- Underlined/Highlighted text MUST be modified to reflect project and mission name
- Both the form AND instructions should be reviewed and modified in general to reflect the needs of the specific umbrella project.
- Both form and instructions must be appended to the Initial Environmental Examination for the overall project.

**DELETE THIS BOX BEFORE MODIFYING/DISTRIBUTING THIS FORM**



**USAID/mission or bureau name  
Instructions for environmental  
review of activities under the XXX project**

**Note**

These instructions accompany the “Environmental Review Form for XXX Project Activities.” Follow, but DO NOT SUBMIT, these instructions.

**Who must submit the Environmental Review Form?**

All organizations applying to implement activities on the XXX Project must complete the “Environmental Review Form” form UNLESS the project or activity is carried out to address an emergency (e.g., international disaster assistance). *Emergencies are determined by the US Ambassador or USAID, not by the applicant.*<sup>1</sup>

**Importance**

The proposed activity cannot be approved and no “irreversible commitment of resources” can be made until the environmental documentation, including any mitigation measures, is approved by the Mission Environmental Officer (MEO). Approval by other authorities in USAID may also be required.

NOTE: USAID may request modifications, or reject the documentation.

If the activities are found to have significant adverse impacts, a full Environmental Assessment must be conducted.

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<sup>1</sup> See 22 CFR §216.2(b)(1). Most activities carried out under emergency circumstances are considered EXEMPT from USAID environmental procedures, except for the procurement or use of pesticides

**Step 1. Provide requested “Applicant information”** (Section A of the form)

**Step 2. List all proposed activities**

In Section B of the form, list all proposed activities. Include all phases: *planning, design, construction, operation & maintenance*. Include ancillary activities. (These are activities that are required to build or operate the primary activity. Examples include building or improving a road so that heavy vehicles can reach the project site, excavation of fill material or gravel for construction, provision of electricity, water, or sewage facilities, disposal of solid waste, etc.)

**Step 3a. Screening: Identify low-risk and high-risk activities**

For *each* activity you have listed in Section B of the form, refer to the list below to determine whether it is a listed low-risk or high-risk activity.

If an activity is specifically identified as “very low risk” or “high risk” in the list below, indicate this in the “screening result” column in Section B of the form.

<p align="center"><b>Very low-risk activities</b> (Activities with low potential for adverse biophysical or health impacts; including §216.2(c)(2))</p>	<p align="center"><b>High-risk activities</b> (Activities with high potential for adverse biophysical or health impacts; including §216.2(d)(1))</p>
<p>Provision of education, technical assistance, or training. (Note that activities directly affecting the environment do not qualify.)</p> <p>Community awareness initiatives.</p> <p>Controlled agricultural experimentation exclusively for the purpose of research and field evaluation confined to small areas (normally under 4 ha./10 acres). This must be carefully monitored and no protected or other sensitive environmental areas may be affected).</p> <p>Technical studies and analyses and other information generation activities not involving intrusive sampling of endangered species or critical habitats.</p> <p>Document or information transfers.</p> <p>Nutrition, health care or family planning, EXCEPT when (a) some included activities could directly affect the environment (construction, water supply systems, etc.) or (b) biohazardous (esp. HIV/AIDS) waste is handled or blood is tested.</p> <p>Rehabilitation of water points for domestic household use, shallow, hand-dug wells or small water storage devices. Water points must be located where no protected or other sensitive environmental areas could be affected.</p> <p><b>NOTE:</b> USAID guidance on potable water requires water quality testing for arsenic, coliform, nitrates and nitrites.</p> <p>Construction or repair of facilities if total surface area to be disturbed is under 10,000 sq. ft. (approx. 1,000 sq. m.) (and when no protected or other sensitive environmental areas could be affected).</p> <p>Support for intermediate credit arrangements (when</p>	<p>River basin or new lands development</p> <p>Planned resettlement of human populations</p> <p>Penetration road building, or rehabilitation of roads (primary, secondary, some tertiary) over 10 km length, and any roads which may pass through or near relatively undegraded forest lands or other sensitive ecological areas</p> <p>Substantial piped water supply and sewerage construction</p> <p>Major bore hole or water point construction</p> <p>Large-scale irrigation</p> <p>Water management structures such as dams and impoundments</p> <p>Drainage of wetlands or other permanently flooded areas</p> <p>Large-scale agricultural mechanization</p> <p>Agricultural land leveling</p> <p>Procurement or use of <u>restricted use</u> pesticides, or wide-area application in non-emergency conditions under non-supervised conditions. (Consult MEO.)</p> <p>Light industrial plant production or processing (e.g, sawmill operation, agro-industrial processing of forestry products, tanneries, cloth-dyeing operations).</p> <p><b>High-risk and typically not funded by USAID:</b></p> <p>Actions determined likely to significantly degrade protected areas, such as introduction of exotic plants or animals</p> <p>Actions determined likely to jeopardize threatened &amp; endangered species or adversely modify their habitat</p>

<b>Very low-risk activities</b> (Activities with low potential for adverse biophysical or health impacts; including §216.2(c)(2))	<b>High-risk activities</b> (Activities with high potential for adverse biophysical or health impacts; including §216.2(d)(1))
<p>no significant biophysical environmental impact can reasonably be expected).</p> <p>Programs of maternal and child feeding conducted under Title II of Public Law 480.</p> <p>Food for development programs under Title III of P.L. 480, when no on-the-ground biophysical interventions are likely.</p> <p>Studies or programs intended to develop the capability of recipients to engage in development planning. (Does NOT include activities directly affecting the environment)</p> <p>Small-scale Natural Resource Management activities for which the answer to ALL SUPPLEMENTAL SCREENING QUESTIONS (attached) is "NO."</p>	<p>(esp. wetlands, tropical forests)</p> <p>Conversion of forest lands to rearing of livestock</p> <p>Planned colonization of forest lands</p> <p>Procurement or use of timber harvesting equipment</p> <p>Commercial extraction of timber</p> <p>Construction of dams or other water control structures that flood relatively undegraded forest lands</p> <p>Construction, upgrading or maintenance of roads that pass through relatively undegraded forest lands. (Includes temporary haul roads for logging or other extractive industries)</p>

(This list of activities is taken from the text of Regulation 216 and other applicable laws, regulations and directives)

### **Step 3b: Identifying activities of unknown or moderate risk.**

All activities NOT identified as "very low risk" or "very high risk" are considered to be of "unknown or moderate risk." Common examples of moderate-risk activities are given in the table below.

Check "moderate or unknown risk" under screening results in Section B of the form for ALL such activities.

<b>Common examples of moderate-risk activities</b>	
<p><b>CAUTION: If ANY of the activities listed in this table may adversely impact (1) protected areas, (2) other sensitive environmental areas, or (3) threatened and endangered species and their habitat, THEY ARE NOT MODERATE RISK. All such activities are HIGH RISK ACTIVITIES.</b></p>	
<p>Small-scale agriculture, NRM, sanitation, etc. <u>define what is meant by "small-scale" for each project.</u></p> <p>Controlled and carefully monitored agricultural experimentation exclusively for the purpose of research and field evaluation of MORE than 4 ha.</p> <p>Moderate scale construction or rehabilitation of facilities or structures <u>surface area to be disturbed exceeds 10,000 sq. ft (1000 sq meters) but funding level is \$200,000 or less.</u></p> <p>Construction or rehabilitation of rural roads meeting the following criteria:</p> <ul style="list-style-type: none"> <li>▪ Length of road work is less than ~10 km</li> <li>▪ No change in alignment or right of way</li> <li>▪ Ecologically sensitive areas are at least 100 m away from the road and not affected by construction or changes in drainage.</li> <li>▪ No protected areas or relatively undegraded forest are within 5 km of the road.</li> </ul> <p>Food for Development programs under Title II or III, involving small-scale infrastructure with the known potential to cause environmental harm (e.g., roads, bore holes).</p> <p>Quantity imports of commodities such as fertilizers.</p> <p>Technical studies and analyses or similar activities that could involve intrusive sampling of endangered</p>	<p>Construction or rehabilitation of small-scale water points or water storage devices for domestic or non-domestic use. (Covers activities NOT included under "Very low risk activities" above.)</p> <p><b>NOTE:</b> USAID guidance on water quality requires testing for arsenic, nitrates, nitrites and coliform bacteria.</p> <p>Support for intermediate credit institutions when indirect environmental harm conceivably could result.</p> <p>Institutional support grants to NGOs/PVOs when the activities of the organizations are known and may reasonably have adverse environmental impact.</p> <p>Small-scale use of USEPA-registered, least-toxic general-use pesticides. Use must be limited to NGO-supervised use by farmers, demonstration, training and education, or emergency assistance.</p> <p><b>NOTE:</b> Environmental review (see step 5) must be carried out consistent with USAID Pesticide Procedures as required in Reg. 16 [22 CFR 216.3(b)(1)].</p> <p>Nutrition, health care or family planning, if (a) some included activities could directly affect the environment (e.g., construction, supply systems, etc.) or (b) biohazardous healthcare waste (esp. HIV/AIDS) is produced, syringes are used, or blood</p>

Common examples of moderate-risk activities	
<b>CAUTION: If ANY of the activities listed in this table may adversely impact (1) protected areas, (2) other sensitive environmental areas, or (3) threatened and endangered species and their habitat, THEY ARE NOT MODERATE RISK. All such activities are HIGH RISK ACTIVITIES.</b>	
species or critical habitats. (Includes aerial sampling.)	is tested.

### **Step 4. Determine if you must write an Environmental Review Report**

Examine the “screening results” as they are entered in Table 1 of the form.

- If ALL the activities are “very low risk,” then no further review is necessary. In Section C of the form, check the box labeled “very low risk activities.” Skip to Step 8 of these instructions.
- If ANY activities are “unknown or moderate risk,” you MUST complete an ENVIRONMENTAL REVIEW REPORT addressing these activities. Proceed to Step 5.
- If ANY activities are “high risk,” note that USAID’s regulations usually require a full environmental assessment study (EA). Because these activities are assumed to have a high probability of causing significant, adverse environmental impacts, they are closely scrutinized. *Any* proposed high-risk activity should be discussed in advance with USAID.

In some cases, it is possible that effective mitigation and monitoring can reduce or eliminate likely impacts so that a full EA will not be required. If the applicant believes this to be the case, the Environmental Review Report must argue this case clearly and thoroughly. Proceed to Step 5.

### **Step 5. Write the Environmental Review Report, if required**

The Environmental Review Report presents the environmental issues associated with the proposed activities. It also documents mitigation and monitoring commitments. Its purpose is to allow the applicant and USAID to evaluate the likely environmental impacts of the project.

For moderate risk activities, the Environmental Review Report is typically a SHORT 2–3 page document. The Report will typically be longer when (1) activities are of higher or unknown risk, and (2) when a number of impacts and mitigation measures are being identified and discussed.

The Environmental Review Report follows the outline below:

- A. **Summary of Proposal.** Summarize background, rationale and outputs/results expected. (reference to proposal, if appropriate).
- B. **Description of activities.** For all moderate and high-risk activities listed in Table 1 of the form, succinctly describe location, siting, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during all project phases and who will undertake them. (All of this information can be provided in a table). If various alternatives have been considered and rejected because the proposed activity is considered more environmentally sound, explain these.
- C. **Environmental Situation & Host Country environmental requirements.** Describe the environmental characteristics of the site(s) where the proposed activities will take place. Focus on site characteristics of concern—e.g., water supplies, animal habitat, steep slopes, etc. With regard to these critical characteristics, is the environmental situation at the site degrading, improving, or

stable? In this section, also describe applicable host country environmental regulations, policies and practices.

- D. Evaluation of Activities and Issues with Respect to Environmental Impact Potential.** Include impacts that could occur before construction starts, during construction and during operation, as well as any problems that might arise with abandoning, restoring or reusing the site at the end of the anticipated life of the facility or activity.

Explain direct, indirect, induced and cumulative effects on various components of the environment (e.g., air, water, geology, soils, vegetation, wildlife, aquatic resources, historic, archaeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc.)

- E. Environmental Mitigation Actions (including monitoring).** Provide a workplan and schedule identifying the following:

**Mitigation measures.** Identify the means taken to avoid, reduce or compensate for impacts. (For example, restoration of borrow or quarry areas, replanting of vegetation, compensation for any relocation of homes and residents.) If standard mitigation or best practice guidance exists and is being followed, cite this guidance.

**Monitoring** Indicate how mitigation measures will be monitored to ensure that they accomplish their intended result. If some impacts are uncertain, describe the monitoring which will be conducted to identify and respond to these potential impacts.

**Responsible parties.** Identify *who* will undertake mitigation and who will conduct the monitoring, and at what frequency.

- F. Other Information.** Where possible and as appropriate, include photos of the site and surroundings; maps; and list the names of any reference materials or individuals consulted.

(Pictures and maps of the site can substantially reduce the written description required in parts B & C)

## **Step 6. Based on the environmental review, reach a recommended determination for *each* high-risk or unknown/moderate-risk activity**

For each high-risk or unknown/moderate-risk activity, the environmental review will help you decide between one of three recommended determinations:

- **no significant adverse impacts.** The activity in question will not result in significant, adverse environmental impacts. Special mitigation or monitoring is not required. Typically, this conclusion is not appropriate for high-risk activities.
- **no significant adverse impacts given specified mitigation and monitoring** With mitigation and monitoring as specified in the Environmental Review Report, the activities in question will not result in significant adverse environmental impacts.
- **significant adverse impacts.** The activities in question is likely to cause significant adverse environmental impacts and cannot be mitigated with best practices or other measures. A full environmental assessment will be required.

For each high-risk or unknown/moderate-risk activity, indicate your “recommended determination” in Section B of the form.)

**Step 7: Summarize recommended determinations**

In section C of the form, summarize your recommended determinations by checking ALL categories indicated in Table 1.

**Step 8. Sign certifications** (Section D of form)

**Step 9. Submit form to USAID project officer**

Attach Environmental Review Report, if any.





**USAID/mission or bureau name:  
Environmental Review Form for XXX  
Project Activities**

**Note: Follow, but do not submit, the attached instructions.**

**A. Applicant information**

Organization	Parent grant or project
Individual contact and title	Address, phone & email (if available)
Proposed activity (brief description)	Amount of funding requested
Location of proposed activity	Start and end date of proposed activity

**B. Activities, screening results, and recommended determination**

Proposed activities (continue on additional page if necessary)	Screening result (Step 3 of instructions)			Recommended Determinations (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities)		
	Very Low Risk	High-Risk*	Moderate risk or unknown*	No significant adverse impact	With specified mitigation, no significant adverse impact.	Significant Adverse impact
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						

\*These screening results require completion of an Environmental Review Report

**C. Summary of recommended determinations** (check ALL that apply)

<b>The proposal contains. . .</b>	<i>(equivalent Regulation 216 terminology)</i>
<input type="checkbox"/> Very low risk activities	<i>categorical exclusion(s)</i>
<input type="checkbox"/> After environmental review, activities determined to have <b>no significant adverse impacts*</b>	<i>negative determination(s)*</i>
<input type="checkbox"/> After environmental review, activities determined to have <b>no significant adverse impacts, given specified mitigation and monitoring*</b>	<i>negative determination(s) with conditions*</i>
<input type="checkbox"/> After environmental review, activities determined to have <b>significant adverse impacts*</b>	<i>positive determination(s)*</i>

\*for these determinations, the form is not complete unless accompanied by Environmental Review Report

**D. Certification:**

I, the undersigned, certify that:

1. the information on this form is correct and complete
2. the following actions have been and will be taken to assure that the activity complies with environmental requirements established for this Project:
  - Those responsible for implementing this activity have received training in environmental review AND training and/or documentation describing essential design elements and best practices for activities of this nature.
  - These design elements and best practices will be followed in implementing this activity.
  - Any specific mitigation or monitoring measures described in the Environmental Review Report will be implemented in their entirety.
  - Compliance with these conditions will be regularly confirmed and documented by on-site inspections during the activity and at its completion.

(Signature) \_\_\_\_\_ (Date) \_\_\_\_\_

(Print name) \_\_\_\_\_

**BELOW THIS LINE FOR USAID USE ONLY**

**Clearance record**

USAID Project Officer	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			
USAID MEO	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			
USAID REO*	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			
USAID BEO*	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			

\*REO and BEO approval required for all "high risk" screening results and for determinations of "significant adverse impacts"

**Note: if clearance is denied, comments must be provided to applicant**

**Note to individuals adapting this form for use on a particular project:**

- This supplement is oriented around major resource/issue clusters and asks “leading questions” about the actual potential for unintended harmful impacts of CBNRM/ECOTOURISM activities.
- Underlined/Highlighted text **MUST** be modified to reflect project and mission name
- Questions should be modified to respond to the needs of individual projects. This is intended to be a “living” document subject to adaptation.

**DELETE THIS BOX BEFORE MODIFYING/DISTRIBUTING THIS FORM**



**USAID/mission or bureau name  
Supplemental screening questions for  
natural resources activities under the XXX  
project (or program)**

**Purpose**

This is a supplement to the “Instructions for Environmental Review under the XXX project.” It is to be used for natural resources-based activities, including:

- Community-Based Natural Resource Management (CBNRM)
- Ecotourism
- Natural resources-based enterprise development with micro- and small enterprises

This supplement provides additional questions to ascertain whether these proposed activities should be categorized as “very low risk:”

- If the answers to ALL the questions that follow are “NO,” then the proposed CBNRM or Ecotourism activity is considered “very low risk.”
- If the answer to ANY question is “YES,” the activity CANNOT be considered “very low risk.”

**Screening questions**

Will the activities...	YES	NO
<b>Natural Resources</b>		
Accelerate erosion by water or wind?		
Reduce soil fertility and/or permeability?		
Alter existing stream flow, reduce seasonal availability of water resources?		
Potentially contaminate surface water and groundwater supplies?		
Involve the extraction of renewable natural resources?		
Lead to unsustainable use of renewable natural resources such as forest products?		

## DISCUSSION DRAFT

Will the activities...	YES	NO
Involve the extraction of non-renewable natural resources?		
Restrict customary access to natural resources?		
Reduce local air quality through generating dust, burning of wastes or using fossil fuels and other materials in improperly ventilated areas?		
Affect dry-season grazing areas and/or lead to restricted access to a common resource?		
Lead to unsustainable or unnecessarily high water extraction and/or wasteful use?		
<b>Ecosystems and Biodiversity</b>		
Drain wetlands, or be sited on floodplains?		
Harvest wetland plant materials or utilize sediments of bodies of water?		
Lead to the clearing of forestlands for agriculture, the over-harvesting of valuable forest species?		
Promote in-forest bee keeping?		
Lead to increased hunting, or the collection of animals or plant materials?		
Increase the risks to endangered or threatened species?		
Introduce new exotic species of plants or animals to the area?		
Lead to road construction or rehabilitation, or otherwise facilitate access to fragile areas (natural woodlands, wetlands, erosion-prone areas)?		
Cause disruption of wildlife migratory routes?		
<b>Agricultural and Forestry Production</b>		
Have an impact on existing or traditional agricultural production systems by reducing seed availability or reallocating land for other purposes?		
Lead to forest plantation harvesting without replanting, the burning of pastureland, or a reduction in fallow periods?		
Affect existing food storage capacities by reducing food inventories or encouraging the incidence of pests?		
Affect domestic livestock by reducing grazing areas, or creating conditions where livestock disease problems could be exacerbated?		
Involve the use of insecticides, herbicides and/or other pesticides?		
<b>Community and Social Issues</b>		
Have a negative impact on potable water supplies?		
Encourage domestic animal migration through natural areas?		
Change the existing land tenure system?		
Have a negative impact on culturally important sites in the community?		
Increase in-migration to the area?		
Create conditions that lead to a reduction in community health standards?		
Lead to the generation of non-biodegradable waste?		
Involve the relocation of the local community?		
Potentially cause or aggravate land-use conflicts?		

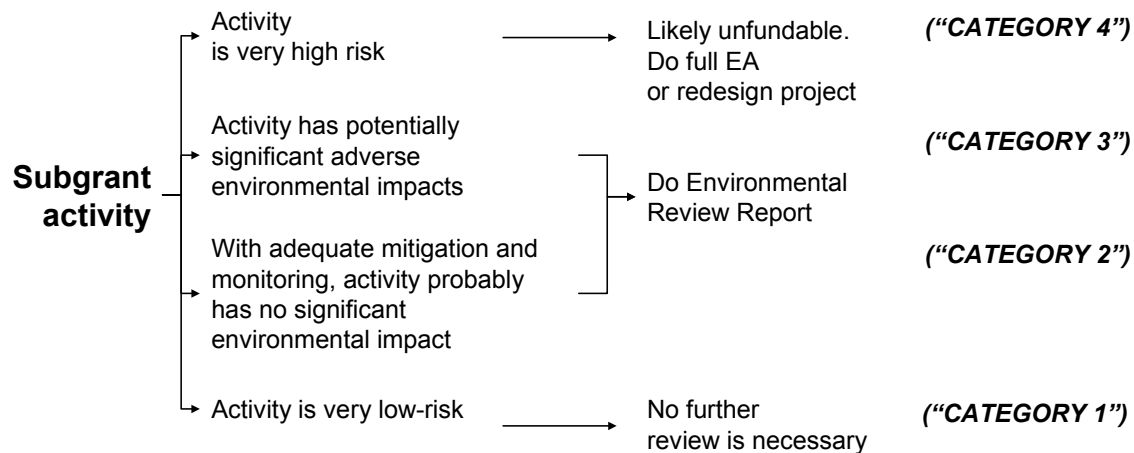
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## **Attachment 3a to Annex G:**

### **Explanation of the 2<sup>nd</sup> Sample Environmental Review Form (ERF)**

A second example of an Environmental Review Form is provided in this Annex. This is the “Environmental Screening & Report Form for NGO/PVO Activities and Grant Proposals.”

This form has been in use by Africa Bureau for several years. It assigns proposed sub-activities to four screening categories, as depicted in the diagram below:



As with the 1<sup>st</sup> sample ERF format, an Environmental Review Report is used to ascertain the likely environmental impacts of all but the lowest-risk activities.

Category 1 and Category 2 activities can be approved at the mission level. Category 3 and 4 activities must be referred to the Bureau and Regional Environmental Officers, with Category 4 activities being likely unfundable.



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***Attachment 3b to Annex G:***

***2<sup>nd</sup> Sample Environmental Review Form—  
the “Environmental Screening & Report  
Form for NGO/PVO Activities and Grant  
Proposals”***





# ENVIRONMENTAL SCREENING/REPORT FORM FOR NGO/PVO ACTIVITIES

## BACKGROUND

USAID, as a "re-engineered, learning institution," has introduced major changes in its new operations systems, with a strengthened focus on results (not activities), greater accountability and empowerment, teamwork, participation and customer orientation. For example, projects are replaced with "results packages" provide USAID operating units and collaborators the flexibility they need to adapt to changes during implementation. The underlying rationale is to focus on results, while still managing inputs and monitoring outputs properly, and to give those responsible (including the host country partners) for achieving results the flexibility to change approaches and tactics as situations change or lessons are learned.

USAID's Africa Bureau Environmental Office, in conjunction with the Regional Environmental Offices, has been developing an initiative for environmental management capacity building. This initiative is intended to support USAID/AFR Missions, their implementing agents and collaborators. An important rationale for this initiative is that Africa Bureau environmental and legal staff anticipate providing significantly enhanced responsibility to carry out environmental reviews to those USAID Mission programs whose designers and/or implementors have successfully completed an Environmental Assessment course and/or participated in related capacity-building activities. Relevant agency experience has shown that such enhanced Mission authority can greatly facilitate field-level program activity design and implementation. These NGO Environmental Guidelines are consistent with USAID's new precepts of flexibility.

The present Environmental Screening and Reporting Form (ESF) is designed to be consistent with the Initial Environmental Examination process, and to assist USAID Missions and their implementing partners design and implement activities in an environmentally sound manner in accordance with all salient agency policies and procedures. Use of the ESF will greatly reduce the need for review and approval of NGO activities at the regional or Washington levels.

## INTRODUCTION TO USE OF THIS FORM

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. It is strongly advised that the Mission Environmental Officer make on-site visits prior to finalization of the ESF, and that the ESF be rational and fully defensible and without ambiguity as to how the conclusion was reached that the activity(ies) will have no significant impact.

# ENVIRONMENTAL SCREENING/REPORT FORM FOR NGO/PVO ACTIVITIES

Grantee: \_\_\_\_\_

Grant/Sub-grant: \_\_\_\_\_

Activity Name: \_\_\_\_\_

Duration (proposed start and completion dates): \_\_\_\_\_

## Geographic

Location: \_\_\_\_\_

Activity Description (paragraph(s) describing purpose/outputs and potential environmental impacts): [add space as needed]

## Determine the Nature of the Activity

- a. **Environmental Review Report Needed.** Does the activity include funds to support any physical natural resource management activities, or any community and rural development services, infrastructure, public facilities or road rehabilitation? Does it involve development of income-generating or resource management systems, or certain kinds of applied ecological or natural resources research? It will likely require an Environmental Review of the kind described in Step 4 of this form. Determine under which Category the activity falls to establish the need for the Environmental Review.
- b. **No Further Environmental Review Required.** Is the activity exclusively to provide technical assistance, training, institutional strengthening, or research, education, studies or other information analysis, awareness-building or dissemination activities *with no foreseeable negative impact on the biophysical environment*? This probably qualifies as a Category 1 activity -- no further environmental review or action may be necessary. Complete form to establish this circumstance.
- c. **Emergency Circumstances Apply.** Does the activity involve an emergency circumstance (e.g. drought)? Under specific conditions, the activity may be *exempt* from further environmental review. Must be determined by Bureau Environmental Officer with input from Regional and Mission Environmental Officers. Sound environmental implementation principles are to be applied to any urgent programs. Note that exemptions *cannot* be applied in the case of assistance for use or procurement of *pesticides*.
- d. **Multiple Categories.** Many activities will have components or sub-activities in more than one category. Simply mark all that apply. The form will guide you to the appropriate next steps.

### Step 1. Determine Category of Activity:

#### Africa Bureau Category 1 -- no further environmental review needed:

< *Does the activity involve (mark yes where applicable):*

\_\_\_\_\_ Provision of education, technical assistance, or training. Does *not* qualify for "Category 1" if such programs include activities directly affecting the environment.

\_\_\_\_\_ Community awareness initiatives.

\_\_\_\_\_ Controlled experimentation exclusively for the purpose of research and field evaluation confined to small areas (normally under 4 ha., i.e., 10 acres) and carefully monitored (when no protected or other sensitive environmental areas could be affected).

\_\_\_\_\_ Technical studies and analyses and other information generation activities not involving intrusive sampling of endangered species or critical habitats.

\_\_\_\_\_ Document or information transfers.

- \_\_\_\_\_ Nutrition, health care or family planning. Such programs do *not* qualify for "Category 1" if (a) some included activities could directly affect the environment (construction, water supply systems, etc.) or (b) [healthcare waste which is biohazardous \(esp. HIV/AIDS\) is handled or blood is tested.](#)
- \_\_\_\_\_ Rehabilitation of water points for domestic household use, shallow, hand-dug wells or small water storage devices (when no protected or other sensitive environmental areas could be affected). [Pursuant to USAID guidance on water quality, testing required for arsenic, nitrates, nitrites and coliform bacteria.](#)
- \_\_\_\_\_ Construction or repair of facilities if total surface area to be disturbed is under 10,000 sq. ft. (approx. 1,000 sq. m.) (*and* when *no* protected or other sensitive environmental areas could be affected).
- \_\_\_\_\_ Support for intermediate credit arrangements (when *no* significant biophysical environmental impact can reasonably be expected).
- \_\_\_\_\_ Programs of maternal and child feeding conducted under Title II of Public Law 480.
- \_\_\_\_\_ Food for development programs under Title III of P.L. 480, when no on-the-ground biophysical interventions are likely.
- \_\_\_\_\_ Studies or programs intended to develop the capability of recipients to engage in development planning. Do *not* mark "yes" if these involve activities directly affecting the environment.

**Africa Bureau Category 2 -- Negative environmental impacts possible, environmental review required (specific conditions, including monitoring, may be applied):**

*Note:* The Environmental Review (Step 4 below) must address why there will be no potential adverse impacts on protected areas, endangered or threatened species or their critical habitat; or relatively undegraded forest, i.e., justify your conclusion that the proposed Category 2 activities do not belong in Category 3 or 4. Even for activities designed to protect or restore natural resources, the potential for environmental harm exists (e.g., re-introduction of species, controlled burning, fencing, wildlife water points, spontaneous human population shifts in response to activities undertaken, etc.). *If you do not find an exact match listed here for the activity you are undertaking, and it is not in Category 1, 3 or 4, then use the last item in Category 2 to describe the activity and treat it as Category 2 for purposes of environmental review.*

**< Does the activity involve (mark yes, where applicable):**

- \_\_\_\_\_ Small-scale agriculture, NRM, sanitation, etc. (*list and scale to be defined mutually among the appropriate partners -- NGO, donor, host country agencies, REDSO, etc.*).
- \_\_\_\_\_ Controlled experimentation exclusively for the purpose of research and field evaluation (*areas of 4 ha. or more, i.e., 10 acres*) and carefully monitored, when neither protected or other sensitive environmental areas could be adversely affected nor threatened and endangered species and their habitat jeopardized.
- \_\_\_\_\_ Small-scale construction or rehabilitation of facilities or structures in which the surface area to be disturbed exceeds 10,000 sq. ft and funding level is not in excess of \$200,000 and where no protected or other sensitive environmental areas could be affected.
- \_\_\_\_\_ Minor construction or rehabilitation of rural roads less than ca. 10 km (with no change in alignment or right of way), with ecologically sensitive areas at least 100 m away from the road and not affected by construction or changes in drainage; likewise, no protected areas or relatively undegraded forest should be within 5 km of the road.
- \_\_\_\_\_ Nutrition, health care or family planning, *if* (a) some included activities could directly affect the environment (construction, supply systems, etc.) or (b) [biohazardous healthcare waste \(esp. HIV/AIDS\) is handled or blood is tested.](#)
- \_\_\_\_\_ Construction or rehabilitation of small-scale water points or water storage devices for domestic or non-domestic use, not covered in Category 1, when neither protected or other sensitive environmental areas could be adversely affected nor endangered and threatened species jeopardized. [Pursuant to USAID guidance on water quality, testing required for arsenic, nitrates, nitrites and coliform bacteria.](#)
- \_\_\_\_\_ Quantity imports of commodities such as fertilizers.
- \_\_\_\_\_ Food for Development programs under Title II or III, involving known biophysical interventions with potential to cause environmental harm (e.g., roads, bore holes).
- \_\_\_\_\_ Support for intermediate credit institutions when indirect environmental harm conceivably could result.
- \_\_\_\_\_ Institutional support grants to NGOs/PVOs when the activities of the organizations are known and raise the

likelihood of some environmental impact.

\_\_\_\_\_ Technical studies and analyses and other information generation activities that could involve intrusive sampling, including aerial surveys, of endangered species or critical habitats.

\_\_\_\_\_ Small-scale use of USEPA-registered least-toxic *general-use pesticides*, limited to NGO-supervised use by farmers, demonstration, training and education, or emergency assistance. Environmental review must be carried out consistent with USAID Pesticide Procedures as required in Reg. 16 [22 CFR 216.3(b)(1)].

\_\_\_\_\_ Other activities not in Category 1 and not in Category 3 or 4. Specify:

\_\_\_\_\_  
\_\_\_\_\_

< ***Were the following used by the PVO/NGO in designing the above Category 2 activities (yes, no, N/A)?***

\_\_\_\_\_ *USAID/AFR's Environmental Guidelines for NGO and PVO Use in Africa*

\_\_\_\_\_ Any applicable Programmatic Environmental Assessments:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Other:

\_\_\_\_\_ ***Africa Bureau Category 3 -- Significant environmental impacts likely.  
Environmental review required, and Environmental Assessment likely to be required:***

< ***Does the activity involve (mark yes where applicable):***

\_\_\_\_\_ River basin or new lands development

\_\_\_\_\_ Planned resettlement of human populations

\_\_\_\_\_ Penetration road building, or rehabilitation of roads (primary, secondary, some tertiary) over 10 km length, and any roads which may pass through or near relatively undegraded forest lands or other sensitive ecological areas

\_\_\_\_\_ Substantial piped water supply and sewerage construction

\_\_\_\_\_ Major bore hole or water point construction

\_\_\_\_\_ Large-scale irrigation

\_\_\_\_\_ Water management structures such as dams and impoundments

\_\_\_\_\_ Drainage of wetlands or other permanently flooded areas

\_\_\_\_\_ Large-scale agricultural mechanization

\_\_\_\_\_ Agricultural land leveling

\_\_\_\_\_ Procurement or use of restricted use pesticides, or wide-area application in non-emergency conditions under non-supervised conditions

\_\_\_\_\_ Light industrial plant production or processing (sawmill operation, agro-industrial processing of forestry products)

\_\_\_\_\_ Potential to significantly degrade protected areas, such as introduction of exotic plants or animals

\_\_\_\_\_ Potential to jeopardize threatened & endangered species or adversely modify their habitat (esp. wetlands, tropical forests)

The above Category 3 activities are consistent with USAID criteria for activities that normally require a USAID-specific document with a defined format and procedure, called the Environmental Assessment (EA). It is recognized that some of these categories are ambiguous. Mark "yes" if they apply, and show in the Environmental Review (Step 4) the extent and magnitude of activities and their impacts, so that USAID and its partners can determine if an EA is necessary or not.

\_\_\_\_\_ ***Africa Bureau Category 4 -- Activities not fundable or fundable only when specifically defined findings to avoid or mitigate the impacts are made, based on an Environmental Assessment<sup>1</sup>:***

<sup>1</sup> Per Foreign Assistance Act Sect. 118 & 119 relating to overseas assistance affecting Tropical Forestry and Biodiversity

< ***Does the activity involve (mark yes where applicable):***

- \_\_\_\_\_ Actions determined likely to significantly degrade protected areas, such as introduction of exotic plants or animals
- \_\_\_\_\_ Actions determined likely to jeopardize threatened & endangered species or adversely modify their habitat (esp. wetlands, tropical forests)<sup>2</sup>
- \_\_\_\_\_ Conversion of forest lands to rearing of livestock
- \_\_\_\_\_ Planned colonization of forest lands
- \_\_\_\_\_ Procurement or use of timber harvesting equipment
- \_\_\_\_\_ Commercial extraction of timber
- \_\_\_\_\_ Construction of dams or other water control structures which flood relatively undegraded forest lands
- \_\_\_\_\_ Construction, upgrading or maintenance of roads (including temporary haul roads for logging or other extractive industries) which pass through relatively undegraded forest lands.

**Step 2. Summarize and Itemize Activities.** List activities by all categories to which *Yes* was answered.

**Categories of activities as determined below (add entries as required):**

Activity/Sub-Activity	Funding:	Category

**Step 3. Determine Need to Prepare Environmental Review.**

If all activities are in Category 1, sign and date the form. For any activities in Category 2 and 3, prepare an Environmental Review Report assessing all of these activities' impacts. For Category 3 activities, further documentation would be required, once USAID has confirmed the applicability of Category 3, based on the Review. If Category 4 is possible, consult USAID before proceeding with the Environmental Review to determine if activities can be funded and/or whether required EA findings could be made.

For all Category 2 and 3 activities, proceed to Step 4 to prepare Environmental Review.

**Step 4. Prepare Environmental Review**

**Suggested Format for Environmental Review**

<sup>2</sup> Per USAID Environmental Procedures, § 22 CFR 216.5, on Endangered Species

The Environmental Review should be about 5-8 pages long (more if required) and consist of following sections:

1. **Background, Rationale and Outputs/Results Expected** -- summarize and cross-reference proposal if this review is contained therein.
2. **Activity Description** -- Succinctly describe location, siting, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during construction, how intervention will operate and any ancillary development activities that are required to build or operate the primary activity (e.g., road to a facility, need to quarry or excavate borrow material, need to lay utility pipes to connect with energy, water source or disposal point or any other activity needed to accomplish the primary one but in a different location). If various alternatives have been considered and rejected because the proposed activity is considered more environmentally sound, explain these.
3. **Environmental Situation** -- Affected environment, including essential baseline information available for all affected locations and sites, both primary and ancillary activities.
4. **Evaluation of Activities and Issues with Respect to Environmental Impact Potential** -- Include impacts that could occur before construction starts, during construction and during operation, as well as any problems that might arise with restoring or reusing the site, if the facility or activity were completed or ceased to exist. Explain direct, indirect, induced and cumulative effects on various components of the environment (e.g., air, water, geology, soils, vegetation, wildlife, aquatic resources, historic, archaeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc.). Indicate positive impacts and how the natural resources base will be sustainably improved.
5. **Environmental Mitigation Actions (including monitoring and evaluation)** -- For example, indicate means taken to avoid, reduce or compensate for impacts, such as restoration of borrow or quarry areas, replanting of vegetation, compensation for any relocation of homes and residents. Indicate how mitigative measures will be monitored to ensure that they accomplish their intended result or what monitoring might be needed for impacts that one is uncertain about.
6. **Other Information** (as appropriate) -- where possible, include photos of the site and surroundings; list the names of any reference materials or individuals consulted.

**Note:** Specific plans for monitoring of key environmental indicators and mitigation of impacts during activity implementation are especially important; these must be addressed in the review. Information on monitoring results and mitigation of impacts are to be included in all progress reports. Important information and a criterion for evaluation of environmental soundness is showing how the activity is part of or guided by an integrated, community-based resource and land use plan or planning and management framework that considers the appropriate use of multiple resources.

**List of Approvals**

Drafted by: \_\_\_\_\_ Date: \_\_\_\_\_

Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_

PVO/NGO Director (if different from above) \_\_\_\_\_ Date: \_\_\_\_\_

**Clearances:**

USAID Project Manager or Designee: \_\_\_\_\_ Date: \_\_\_\_\_

MEO: \_\_\_\_\_ Date: \_\_\_\_\_

**OR**

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

Indicate here recommendation that an Environmental Assessment (EA) be prepared, if any activities are classified in Category 3 or 4, OR explain why an EA is thought not to be required.

All activities designated Category 3 or 4 **must be referred** to the REDSO/ESA REO/REA and BEO and, in some cases, the RLA. The MEO should also refer any questionable Category 2 activities.

REDSO REO/REA, RLA and BEO Referrals (if appropriate, list names and dates):

esfmst7b

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