

Annex C:

Title II Environmental Compliance Forms

This section contains templates and forms for use in preparing environmental documentation under USAID's procedures.

Note: when using these forms, replace headers and footers with ones which identify your organization/proposal.

C.1 Environmental Compliance Facesheet

(non-Title II activities)

C.2 Title II Environmental Compliance Facesheet

C.3 Request for Categorical Exclusion

C.4 IEE Basic Outline

C.5 Annotated IEE Outline

C.6 Environmental Status Report Facesheet

C.7 Environmental Status Report Instructions and Format

**FACESHEET FOR
INITIAL ENVIRONMENTAL EXAMINATION
OR
CATEGORICAL EXCLUSION**

PROGRAM/ACTIVITY DATA:

Program/Activity Number: (___-___)

Country/Region: _____

Program/Activity Title: _____

Funding Begin: _____ Funding End: _____ LOP Amount: \$ _____
Sub-Activity Amount: \$ _____

IEE Prepared By: _____ Current Date: _____

IEE Amendment (Y/N): _____ If "yes", Filename & date of original IEE _____ ; __/__/__

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

Categorical Exclusion: _____ Negative Determination: _____
Positive Determination: _____ Deferral: _____

ADDITIONAL ELEMENTS: (Place X where applicable)

CONDITIONS _____ PVO/NGO: _____

SUMMARY OF FINDINGS:

* insert space as needed, but summary must not exceed one page in length

** for IEE amendments, clearly indicate the following: the original IEE being amended, the reason for the amendment, key differences between the original and amended IEE; and determination and conditions of the previous IEE being carried forward without amendment.

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

CLEARANCE:

Mission Director: _____ Date: _____

CONCURRENCE:

Bureau Environmental Officer: _____ Date: _____

Carl Gallegos Approved: _____
Filename: _____ (USAID/W BEO) Disapproved: _____

CLEARANCE:

General Counsel (Africa Bureau) _____ Date: _____

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

Mission Environmental
Officer: _____ Date: _____

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

SO Team Leader: _____ Date: _____

Regional Environmental
Officer: _____ Date: _____

TITLE II ENVIRONMENTAL COMPLIANCE FACESHEET

Title of DAP/PAA Activity:

CS name/Country/Region:

Funding Period: FY _____ - FY _____

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

Statement Prepared by: Name _____ Date _____
Title _____

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

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

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

_____ 1. *Categorical Exclusion(s)*

_____ 2. Initial Environmental Examination:

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

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

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

_____ *Deferral:* one or more elements not yet sufficiently defined to perform environmental analysis; activities will not be implemented until amended IEE is approved. Briefly describe the nature of the deferred activities: _____

Summary of Findings:

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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.

for IEE amendments, clearly indicate the following: the original IEE being amended, the reason for the amendment, key differences between the original and amended IEE; and determination and conditions of the previous IEE being carried forward without amendment.

(add space as needed, but NO MORE THAN 1 PAGE)

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:

Clearance:

Mission Director: _____ Date: _____

Food For Peace Director: _____ Date: _____

Concurrence:

Bureau Environmental Officer: _____ Date: _____
(BHR)

Approved: _____

Disapproved: _____

Optional Clearances:

FFP Officer: _____ Date: _____

Mission Food Aid Manager: _____ Date: _____

Mission Environmental Officer: _____ Date: _____

Regional Environmental Officer: _____ Date: _____

Geographic Bureau Environmental Officer: _____ Date: _____

General Counsel: _____ Date: _____

**REQUEST FOR A
CATEGORICAL EXCLUSION**

NOTE: for use ONLY when categorical exclusions are requested for ALL proposed activities.

1. Background and Activity Description

Add space as needed, but this section will typically not exceed 1–2 pages. Provide 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)

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Outline of the IEE Narrative: Template

INITIAL ENVIRONMENTAL EXAMINATION

Program/Project Data:

DAP/PAA Program/Activity:

Name of Proposing Organization, 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**

Annotated IEE Narrative

INITIAL ENVIRONMENTAL EXAMINATION

Program/Project Data:

DAP/PAA Program/Activity:

Name of proposing organization, Country/Region:

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

If you are preparing an “Umbrella” IEE, please refer to Annex G.

1.0 BACKGROUND AND ACTIVITY DESCRIPTION

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

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION

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

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

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

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

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

4.0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

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

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

5.0 SUMMARY OF FINDINGS

This should summarize the proposed environmental determinations and recommendations.

TITLE II ENVIRONMENTAL STATUS REPORT FACESHEET

Title of 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 or PEA

IEE Reference: Date of most recent IEE or Date of Categorical Exclusion (If all activities were CEs): _____

_____ 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 or PEA needs to be amended to cover additional or modified activities. [Note: If yes, immediately notify the MEO, REO (where one exists) or the BHR 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 or PEA, 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.

ENVIRONMENTAL STATUS REPORT (ESR) 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 are being undertaken by the Cooperating Sponsor. In a Mission's PAA comments and/or approval cable to BHR/FFP, the Mission should state whether it concurs with the Environmental Status Report.

Section A. Status of the IEE/Categorical Exclusion/EA or PEA

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 EA which is typically activity or site-specific—or a broader sectoral, thematic or geographic 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 DAP or PAA has an approved IEE. Reference a Categorical Exclusion Document in the event the DAP or PAA 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 DAP requires an IEE Amendment. Also remember that activities can be changed or added that do not require an amended DAP, but which do alter Reg. 216 threshold decisions and would 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 PAA. 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).

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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 PEA 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 BHR 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 EDM Annex F, 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 or PEA, consult the MEO, REO (where available), and the BHR BEO, as amending an EA or PEA 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.