

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

PROGRAM/PROJECT DATA:

Project Name: Peace and Democratic Governance Project
Country/Region: Mali/Africa
Funding Begin: FY 2015
Funding End: December 31, 2019
LOP Amount: \$55,000,000
IEE Expiration Date: December 31, 2019
IEE Prepared By: Erik Pacific, GovCom Team Leader and Salimata Marico, PDG PMS
Current Date: 1/5/2015
IEE Amendment (Y/N): N If «yes», Number and date of original IEE:

ENVIRONMENTAL ACTION RECOMMENDED:

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

ADDITIONAL ELEMENTS:

CONDITIONS: X EMMP: X PVO/NGO: _____

SUMMARY OF FINDINGS:

Purpose and Scope of the IEE

The purpose of this IEE, in accordance with 22CFR216, is to provide the first review of the reasonably foreseeable effects on the environment, and on this basis, recommend Threshold Decisions, and in some cases attendant conditions for activities undertaken under the Peace and Democratic Governance project in Mali. This IEE also sets out project-level implementation procedures intended to assure that conditions in this IEE are translated into specific mitigation measures and actions and to ensure systematic compliance with this IEE during project implementation.

Recommended Environmental Threshold Determinations

Refer to Table 1 Section 3 for details.

Activity component	Recommended Threshold Determination			
	Categorical Exclusion	Neg. Determination w/conditions	Positive Determination	Deferral
Project Purpose 1: Improved Administration of Justice and Human Rights	√			

Project Purpose 2: Responsive and Accountable Service Delivery Increased	√	√		
Project Purpose 3: Citizen participation in Malian electoral processes is increased	√			
Project Purpose 4: Civic engagement to improve government accountability is strengthened	√			
Project Purpose 5: Targeted Communities' resilience to conflict and radicalization strengthened	√	√		

MONITORING AND IMPLEMENTATION

In addition to the specific conditions enumerated in Section 3, the negative determinations recommended in this IEE are contingent on full implementation of the general monitoring and implementation requirements found in Section 4 of this IEE.

APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

Mali

Peace and Democratic Governance (PDG) IEE

Mission Director: [Signature] Date: 3/11/2015
Gary Juste

CONCURRENCE:

Bureau Environmental Officer: [Signature] Date: 3/16/15
Brian Hirsch

Approved: [Signature]
Disapproved: _____

File No _____ (USAID/W BEO) Mali Peace DG - PDG.

ADDITIONAL CLEARANCES

PDG Team Leader: [Signature] Date: 2/17/15
Erik Pacific

Mission Environmental Officer: [Signature] Date: 2/17/15
Souleymane Sogoba

Regional Environmental Officer: [Signature] Date: 2/17/2015
Kalim Hanna

Deputy Mission Director: N/A Date: _____
Erin Pacific

INITIAL ENVIRONMENTAL EXAMINATION

Program/Activity Number:

Country/Region:

Mali/West Africa

Program/Activity Title:

Peace and Democratic Governance Project

1.0 BACKGROUND AND ACTIVITY/PROGRAM DESCRIPTION

1.1 Purpose and Scope of IEE

The purpose of this IEE, in accordance with 22CFR216, is to provide the first review of the reasonably foreseeable effects on the environment, and on this basis, recommend Threshold Decisions, and in some cases attendant conditions for activities undertaken under the Peace and Democratic Governance project in Mali. This IEE also sets out project-level implementation procedures intended to assure that conditions in this IEE are translated into specific mitigation measures and actions and to ensure systematic compliance with this IEE during project implementation.

1.2 Background

Mali was long considered a showcase for democratic development in Africa. With a constitutional form of government that enshrined formal separation of power, rule of law, and respect for human rights, it regularly held elections that met most international standards and peacefully transferred power. All of this changed in 2012 when the country was stricken simultaneously by security, political, and development crises that include a January 2012 rebellion in the North, a coup d'état, an attempted counter coup, and the loss of the northern two-thirds of the country to violent extremist groups. Threats that these extremists could march on the capital in late 2012 undermined national confidence, which continued to suffer as the first waves of euphoric gratitude for the French-led international military intervention in January 2013, gave way to a certain discomfort with Mali's reliance on a continuing international and French presence to restore and maintain its territorial integrity. Following the installation of the third largest planned UN Peacekeeping Mission (MINUSMA), Mali has continued to suffer from periodic attacks in the North by al-Qaeda linked groups, who murdered journalists and peacekeepers while probing weaknesses in security force capabilities.

The political crisis revealed that Mali's democracy had several shortcomings. For years, the power structure concentrated in Bamako was able to hide the endemic corruption that was eating away at the government's legitimacy and weakening the country's institutions. The post coup period revealed a failure to establish a consensual rule of law and effective system of accountability for which the government and elite have the political will to support. The most dominant problems are the concentration of power, impunity, and culture of corruption and intimidation that short-circuit the rule of law and impair good governance. In addition, fundamental issues of reconciliation, transitional justice, and centralization remain unresolved.

The main problem associated with Mali's democracy is a fractured social contract between the Government of Mali and the Malian citizens. A state that is willing and able to provide goods and services to its population and is perceived to be exercising power in ways that are fair, inclusive, transparent, and accountable can be characterized as effective and legitimate. However, when the relationship between state and society is strained and interactions produce outcomes considered illegitimate or ineffective, the state is considered to be highly fragile.

Fragility is associated with a limited willingness and/or capacity by the state to perform key functions within its purview and to address a wide range of public policy and governance challenges. Fragile states are extremely weak and often lack the capacity - and in some case the willingness - to provide public goods and services to its population that are expected of it. When this becomes consistent pattern, the social contract breaks down and grievances start to emerge. This is often due to a widespread perception that the government does not represent the population and in turn, the citizens lack the knowledge and/or will to engage their government to hold them accountable.

The findings from the Mali systems analysis revealed that the break down in the social contract has been fueled by four primary factors. Specifically, illegitimate and ineffective institutions demonstrated by endemic corruption, lack of political will, lack of accountability and pervasive insecurity; weak capacity across all institutions, both governmental and non-governmental; significant challenges facing reconciliation and ensuring lasting peace; and inadequate civic engagement resulting in the marginalization and apathy of the citizenry. These four key themes overlap and affect one another, often exacerbating the tensions between the population and the government

One of the more prominent issues within the breakdown of the social contract is the Government of Mali's flawed implementation of decentralization. Findings from recent assessments revealed that the government's ability to move resources, both financial and human, down to the *commune* level was cited as the most important task and the best way for the government to restore the trust as well as increase the confidence of the population. As such, effective and transparent implementation of decentralization moving forward will be instrumental toward restoring the social contract. The PDG project will contribute directly to the achievement of the CDCS DO1: "Public Trust in Governance Improved" and its three IRs:

- IR 1.1: Responsive and accountable service delivery increased
- IR 1.2: Administration of Justice and respect for human rights improved
- IR 1.3: Citizen participation in Malian electoral process is increased

The Project will also contribute to the following IR under CDCS DO 2:
"Adaptative Capacity of Vulnerable Communities and Households Increased."
IR2.3: Targeted communities' resilience to conflict and radicalization strengthened.

1.3 Description of Activities

Project purpose 1: Improved Administration of Justice and Human Rights

- Key justice sector institutions deliver services more efficiently and effectively and are connected to the regions
- Citizens' access to formal and informal justice mechanism increased
- Citizens are aware of their rights and the reforms being undertaken and know where to find appropriate legal services
- Access to justice increased and corruption reduced along a key trade corridor
- Increased human rights advocacy

Project purpose 2: Responsive and Accountable Service Delivery Increase

- Strengthened local and national-level administrative and public financial management systems, including performance-based budgeting, focusing on the health and education sectors.
- Improved planning processes between subnational and central government actors, particularly in the areas of health and education.

- Improved systems, tools and capacity of the central government to monitor the performance of local governments based on objective and measurable criteria, specifically in the areas of health and education.
- Improved systems, tools and capacity of the central government to monitor the performance of local governments based on objective and measurable criteria, specifically in the areas of health and education.

- Improve the Governance and Delivery of Water and Sanitation Services in Mopti

Project Purpose 3: Citizen participation in Malian electoral process is increased

- Voter participation is higher and more inclusive of marginalized/vulnerable groups than in the past
- CSOs are more capable of independently observing and reporting on elections

Project Purpose 4: Civic engagement to improve government accountability is strengthened

- Mechanisms of bottom-up social accountability increased.
- CSOs partner effectively with government and the private sector to develop public policy and advance for issues of common interest
- Citizens understand their responsibilities and feel empowered to engage sub-national government actors

Project Purpose 5: Targeted Communities's resilience to conflict and radicalization strengthened

- Citizens in targeted areas perceive an increase in responsiveness of Malian government actors
- Communities' social and economic resilience to negative external influences strengthened. This may include cash for work activities.

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

2.1 Locations Affected

A land-locked Sahel state, a large part of Mali's territory is arid and suffers from irregular rainfall. Mali has suffered from serious and prolonged droughts. Mali's natural resource base is being degraded rapidly due to excessive pressure on the land. This degradation is evident as increasing soil erosion, decreasing soil fertility, and reducing in biomass. Similarly, overgrazing degraded pastures, particularly around water points and other areas where herds congregate. The resource base degradation is due to three factors combined: a) excessive population growth; b) a long term decline in rainfall, which has reduced the quality of the resources and their ability to recover from damage; and c) mismanagement of natural resources and the failure to use resource-conserving practices at the farm level. The latter is being improved. Note that the natural environment in the North of the country where these activities will be located is more fragile. Given that only ten to 20 percent of the country's total surface area can be cultivated sustainably with present production methods, the ratio of people to arable land in Mali is well above the Sahel and world averages. Approximately 80 percent of the population of Mali lives and works in rural areas. Unfortunately, the stress put on the resource base by Mali's burgeoning population has been exacerbated by a decline in precipitation over the past 30 years. There has been a southward shift of isohyets of about 110 kilometers and a corresponding southward change in vegetation and climatic conditions unsuitable for various types of agriculture. This has been accompanied by a lowering of the groundwater table by six to 12 meters in some parts of the country over the past ten years. The reduced precipitation has removed large areas of formerly 10 arable land from production, and lowered the productive potential of the remaining range and croplands. The lack of rainfall has also reduced the ability of the natural resource base to recover from misuse or temporary overuse. Therefore, the intervention of USAID activities should help improve the management and the protection of the environment through the appropriate best practices.

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

The EIA system is almost the only functioning environmental management system in Mali and the Government of Mali is committed to EIA as a strategic tool for environmental management. The Strategic Environmental Assessment (SEA) is now being considered for incorporation into the policies, although a non-satisfactory EIA system due to funding problems for the assessment and the monitoring of the recommendations.

Mali's EIA system suffers from a number of systemic weaknesses and cannot be considered a reliable mechanism to assure the environmental soundness of public infrastructure projects (although being improved) such as schools, health centers, particularly for the smaller-scale projects that are the focus of this program. (For more detail, see a 2006 evaluation commissioned by USAID/Mali: http://pdf.usaid.gov/pdf_docs/PNADI667.pdf).

3.0 EVALUATION OF PROJECT ACTIVITIES (INCLUDING SMALL GRANTS) WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL AND RECOMMENDED THRESHOLD DECISIONS

The different activities of the project, their potential negative impacts and the recommended environmental determinations are as follows:

Table 1: Evaluation of project activities with respect to environmental impact and recommended determinations.

Proposed Activities	Potential Adverse Impacts	Recommended Determinations
Project Purpose 1: Improved Administration of Justice and Human Rights		
Output 1.1 Key justice sector institutions deliver services more efficiently and effectively and are connected to the regions.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output will consist of technical assistance inside government institutions to improve business processes. No infrastructure will be funded under this output.
Output 1.2 Citizens' access to formal and informal justice mechanisms increased	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output will focus on training, assessments, and operational support to legal clinics.
Output 1.3 Citizens are aware of their rights and the reforms being undertaken and know where to find appropriate legal services	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(v) for document and information transfer. This output works with civil society to promote legal awareness and builds capacity of media units within legal institutions.
Output 1.4 Access to justice increased and corruption reduced along a key trade corridor	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output works to promote anti-corruption campaigns with civil society in a targeted area. It also will support operational costs of legal clinics in targeted areas.
Output 1.4 Increased human rights advocacy	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment, 22CFR 216.2(c)(2)(v) for document and information transfer, and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output works with civil society to promote human rights advocacy and information sharing.
Project Purpose 2: Responsive and Accountable Service Delivery Increased		
Output 2.1: Strengthened local and national-level administrative and public financial management systems, including performance-based budgeting, focusing on the	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output provides technical assistance to civil servants.

health and education sectors.		
Output 2.2: Improved planning processes between subnational and central government actors, particularly in the areas of health and education.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output provides technical assistance to civil servants.
Output 2.3: Improved systems, tools and capacity of the central government to monitor the performance of local governments based on objective and measurable criteria, specifically in the areas of health and education.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output provides capacity building services to the Supreme Audit Institution.
Output 2.4: Improve the Governance and Delivery of Water and Sanitation Services in Mopti	<ul style="list-style-type: none"> ▪ Improper siting of facilities that damages or destroys natural ecosystems (within wetlands, protected areas, or other sensitive habitats, etc.) ▪ Depletion of freshwater resources (surface and groundwater) ▪ Conflict over water resource allocation ▪ Creation of stagnant (standing) water near water points that could create breeding opportunities for water-borne disease vectors ▪ Natural or human-caused biological or chemical contamination of water sources (surface and groundwater), causing increased human health risks, including: high arsenic or other mineral/chemical levels; poor management of water points and/or poor design of pipes leading to leakage and contamination of 	<p>A Negative determination pursuant to 22 CFR 216.3 (a)(2)(iii) subject to the following conditions:</p> <ul style="list-style-type: none"> ▪ All WASH activities will be conducted following best practices and principles provided in the USAID Environmental Guidelines for Small-scale Activities in Africa Construction, and Water Supply and Sanitation chapters found at www.usaidgems.org/sectorGuidelines.htm ▪ Take measures to prevent groundwater or surface water contamination. ▪ If needed, ensure that wells are constructed away from latrines and that the areas around the wells are sanitary. ▪ Train and assist to address issues of environmental sound practices in water and sanitation programs including sustainable resource use and exploitation. ▪ Water quality testing is essential for determining that the water from a constructed water source is safe to drink and to determine a baseline so that any future degradation can be detected. Simple and cost-effective sample kits for E. coli and fecal coliforms are available through a variety of manufacturers (e.g., Idexx Colilert or Coliscan Easygel). Any USAID-supported activity engaged in the provision of potable water must adhere to Guidance Cable State 98108651, which requires arsenic testing. The GovCom team must assure that the standards and testing procedures described in this guideline document are followed for any new or rehabilitated potable water systems under this IEE. ▪ Initial water quality testing is the responsibility of the program to assure, but

	<p>water with fecal matter, solid waste, etc.; dust particles and birds sheltering on the roof that contaminate cisterns (e.g., rainwater harvesting systems)</p> <ul style="list-style-type: none"> ▪ Land use change including site alteration, road access, overgrazing (due to uncontrolled livestock populations), and expanded human settlement areas that can lead to: Soil erosion; Degradation of water quality; Altered hydrology and flooding; Increased deforestation; ▪ Increased human health risks from contamination of surface water, groundwater, soil, and food by human waste and disease pathogens ▪ Degradation of stream, lake water quality and degradation of land habitats, or negative impacts to surface or groundwater quality due to inappropriate siting or construction of latrines or wastewater collection systems, or release of human waste from sanitation facilities ▪ Defecation around and not in latrines or other sanitation facilities, potentially contaminating surface water and/or shallow groundwater sources, adversely affecting both human and ecosystem health ▪ Damage to the aesthetics of the sanitation facility site (visual, smell, 	<p>when feasible the program should also set in place capacities and responsibilities to provide reasonable assurance that ongoing water quality monitoring occurs. The standards for initial and ongoing testing – types of contaminants for which testing should be conducted, testing methods, testing frequency, and issues such as public access to results -- should follow any applicable USAID guidance, as well as local laws, regulations and policies. Local response protocol should be followed in the event that water quality testing detects contamination, including promotion of household water treatment using recommended products (Promotion of Aquatabs is already supported by USAID funds in Mali).</p> <p>The subproject /subgrant review process must include the completion and approval of an ERF and EMMP forms (available at www.usaidgems.org) prior to initiating any small scale water or sanitation activities under subgrants.</p>
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	etc.)	
Project Purpose 3: Citizen participation in Malian electoral processes is increased		
Output 3.1 Voter participation is higher and more inclusive of marginalized/vulnerable groups than in the past	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output provides capacity building services to civil society and electoral management bodies involved in elections management and oversight.
Output 3.2 CSOs are more capable of independently observing and reporting on elections	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Project Purpose 4: Civic engagement to improve government accountability is strengthened		
Output 4.1 Mechanisms of bottom-up social accountability increased.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output provides capacity building services to civil society and electoral management bodies involved in elections management and oversight.
Output 4.2 CSOs partner effectively with government and the private sector to develop public policy and advance for issues of common interest	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output provides capacity building services to civil society.
Output 4.3 Citizens understand their responsibilities and feel empowered to engage sub-national government actors	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output provides capacity building services to civil society.
Project Purpose 5: Targeted Communities' resilience to conflict and radicalization strengthened		
Output 5.1: Citizens in targeted areas perceive an increase in responsiveness of Malian government actors (except for activities related to small scale infrastructure rehabilitation).	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.

<p>Output 5.1: small scale infrastructure rehabilitation</p>	<ul style="list-style-type: none"> ▪ Damage to sensitive or valuable ecosystems from construction of infrastructure, associated temporary worker dwelling, or construction storage units for personnel or equipment ▪ Removal of vegetation and/or compaction of the soil and grading of the site, altering drainage patterns and water tables, changing access to water by animals, people and vegetation, or degrading water resources ▪ Sedimentation of surface waters through removal of natural land cover, excavation, extraction of construction materials and other construction-related activities that result in soil erosion ▪ Contamination of groundwater and surface water supplies through improper disposal of human and other biological wastes during the construction period ▪ Contamination of ground and surface water supplies through improper disposal or handling of toxic materials used in construction (e.g., solvents, paints, vehicle maintenance fluids (oil, coolant), and diesel fuel) ▪ Adverse social impacts due to displacement of local inhabitants, influx of outside workers, inequitable distribution of economic benefits of construction, 	<p>A Negative determination pursuant to 22 CFR 216.3 (a)(2)(iii) subject to the following conditions:</p> <ul style="list-style-type: none"> ▪ All activities will be conducted following best practices and principles provided in the USAID Environmental Guidelines for Small-scale activities in Africa Construction chapter and when appropriate Water supply and Sanitation chapter found at www.usaidgems.org. ▪ Take measures to prevent groundwater or surface water contamination. ▪ If needed, ensure that wells are constructed away from latrines and that the areas around the wells are sanitary. ▪ Small scale infrastructure construction sites are not within 30m of a permanent or seasonal stream or water body, will not involve displacement or existing inhabitants, has an average slope of 5% and is not heavily forested or in an otherwise undisturbed ecosystem. ▪ Implementing partners must work with the responsible party to develop a practical environmental management protocol and maximize the probability that it will continue to be implemented after project hand-off ▪ Designs must provide for drainage, sanitation, and fresh water as appropriate. ▪ Construction management. The ERF process must impose the following construction management requirements: (1) During construction, prevent sediment-heavy run-off from cleared site or material stockpiles to any surface waters or fields with berms, by covering sand/dirt piles, or by choice of location. (Only applies if construction occurs during rainy season.); (2) Construction must be managed so that no standing water on the site persists more than 4 days; (3) IPs must require their general contractor to certify that it is not extracting fill, sand or gravel from waterways or ecologically sensitive areas, nor is it knowingly purchasing these materials from vendors who do so; (4) IPs must identify and implement any feasible measures to increase the probability that timber is procured from legal, well-managed sources. ▪ Drinking water-related interventions must conform with the good design and implementation practices described in Water Supply and Sanitation Chapter of the USAID Environmental Guidelines for Small-scale Activities (http://www.usaidgems.org/sectorGuidelines.htm) ▪ Water quality testing is essential for determining that the water from a constructed water source is safe to drink and to determine a baseline so that any
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	<p>etc.</p> <ul style="list-style-type: none"> ▪ Spread of disease through migration of construction workers from other regions or construction of a new road, especially sexually transmitted diseases such as HIV/AIDS ▪ Damage to aesthetics of site/area Improper extraction of construction materials such as wood, stone, gravel, or clay that damages terrestrial ecosystems (e.g., wood may come from relatively intact or natural forests) ▪ In operation, general/institutional facilities & compounds generate a set of waste streams (e.g. gray water, solid waste). In general, if improperly managed, such wastes can contaminate ground and surface water, create breeding habitat for disease vectors, etc. Storing solid waste (usually a mixture of food scraps, packaging, and paper) in open containers creates breeding habit for and attracts disease vectors such as rodents. Failure to design or maintain appropriate drainage structures can result in standing water within the compound or on adjacent lands, which is of particular concern as malaria is endemic in most of Mali. 	<p>future degradation can be detected. Simple and cost-effective sample kits for E. coli and fecal coliforms are available through a variety of manufacturers (e.g., Idexx Colilert or Coliscan Easygel). Any USAID-supported activity engaged in the provision of potable water must adhere to Guidance Cable State 98108651, which requires arsenic testing. The GovCom team must assure that the standards and testing procedures described in this guideline document are followed for any new or rehabilitated potable water systems under this IEE.</p> <ul style="list-style-type: none"> ▪ Initial water quality testing is the responsibility of the program to assure, but when feasible the program should also set in place capacities and responsibilities to provide reasonable assurance that ongoing water quality monitoring occurs. The standards for initial and ongoing testing – types of contaminants for which testing should be conducted, testing methods, testing frequency, and issues such as public access to results -- should follow any applicable USAID guidance, as well as local laws, regulations and policies. Local response protocol should be followed in the event that water quality testing detects contamination, including promotion of household water treatment using recommended products (Promotion of Aquatabs is already supported by USAID funds in Mali).
Output 5.2 Communities’ social and economic resilience to		

<p>negative external influences strengthened. This may include cash for work activities or provide support with a range of social and economic opportunities to increase the frequency and quality of communities' interactions. It will build on the work already done under both the OTI PAT-M and the Mission's cross-sectoral out-of-School Youth programs such as:</p> <p>Repair and rehabilitation of facilities and spaces (school, clinics, building, market places, parks)</p>	<p>(e.g., schools, clinics, government buildings, market places, and parks) may cause both direct and indirect potentials adverse environmental impacts during both rehabilitation and operational phases. While it is assumed that these projects will take place on an existing site, the repair or replacement of infrastructure well beyond its useful life may more closely approximate new construction (with the exception of site selection), resulting in greater environmental impact if demolition is required, or more materials are required for the project.</p> <p>An example of a direct impact is the filling of a wetland to use as a project site or staging site. (e.g., lead paint, lead or asbestos-containing materials or other toxic/hazardous materials) and how to properly dispose of construction wastes and</p>	<p>A Negative determination pursuant to 22 CFR 216.3 (a)(2)(iii) subject to the following conditions:</p> <p>USAID/PDG will ensure that the PDG Contractor will follow an environmental compliance process tailored to PDG's business model that is flexible and responsive to the needs of the PDG program. Assessment, Analysis and Reporting", including:</p> <ol style="list-style-type: none"> 1) Screening and Verification of risk for activities classified as a Categorical Exclusion 2) Developing an Initial Environmental Mitigation and Monitoring Plan (EMMP) analyzing environmental impacts, mitigation measures, and monitoring steps for only those activities classified as a Negative Determination with Conditions, within two to three months of program start. Process for Development of an Environmental Mitigation and Monitoring Plan for (EMMP) for PDG programs). Impact planning, Assessment, Analysis and Reporting: Including: <ol style="list-style-type: none"> 1) Screening and Verification of risk for activities classified as a Categorical Exclusion (Screening Guidance for Verification of Environmental Risk for PDG Programs); 2) Developing an Initial Environmental Mitigation and Monitoring Plan (EMMP) analyzing environmental impacts, mitigation measures, and monitoring steps for
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<p>Microenterprise support and skills/capacity building activities that may have environmental impact (e.g. some agriculture – or water-related activities .</p>	<p>solid/sanitation wastes associated with regular use. Issues of occupational health and safety among construction workers could also result if measures are not put in place to address safety measures such as wearing Personal Protective Equipment (PPE's), safety</p> <p>While they would be of relatively small scale, there could be a potential for activity to negatively impact the environment, for example, by direct provision of financial support to agriculturally-based small business resulting in agricultural expansion. Other examples of potential impacts of supporting microenterprise systems may include training and skills building in activities where processing may cause contamination to water systems, such as runoff from metal processing and leather tanning.</p>	<p>only those activities classified as a Negative Determination with Conditions, within two to three months of program start (Process for Development of an Environmental Mitigation and Monitoring Plan for (EMMP) for PDG programs);</p> <p>3) Revising the EMMP triggered by new or expanded activities as determined in cooperation with the as determined over the Life of Program and on an ad hoc basis,</p> <p>LIMITATIONS This IEE does not provide an Environmental Threshold Decision for the following activities, which would require additional supplemental analysis:</p> <ol style="list-style-type: none"> 1. Large-scale activities (e.g., >1,000 m2 building construction, new roads, resettlement projects, major water points, etc.) 2. Operation in environmentally sensitive areas such as protected wetlands and wildlife reserves. <p>All private investments and public private partnerships will incorporate as a core value the fostering of an environmentally sound/sustainable social and economic resilience, and that this value be fully mainstreamed and integrated in programming and activities.</p>
<p>Small-scale road rehabilitation</p>	<p>Rehabilitated roads with poor cambering or poorly designed/maintained side drains are major contributors to erosion (and road deterioration); rehabilitated roads that cross steep terrain without following contours can particularly speed hillside erosion (and are especially prone to deterioration and require expensive</p>	

<p>Youth Community Economic Mapping Agro-Enterprise Development Skills and Experiences Passports, Community Service / Community Celebrations</p> <p>Training and technical support (income generating activities) in agriculture, poultry raising, bakery, livestock fattening, production/repair of agricultural tools, food processing and marketing (including the transformation of agricultural products and restoration)</p>	<p>maintenance. In addition, runoff of both silt and chemicals (e.g., fuels) from roads and construction camps can reduce quality and health of nearby surface waters and agricultural fields. While roads support access to social services such as education and health care, they can also have adverse social impacts, including increased sexually transmitted diseases and weakened communities.</p>	<p>Negative determination subject to the condition that: Training and technical assistance for small income generating activities must address issues of environmental sound practices including sound waste management practices, sustainable resource use and exploitation as well as occupational health and safety measures (see USAID’s Environmental Guidelines for Small-Scale Activities in Africa part II (agriculture and irrigation, livestock, fisheries and aquaculture, solid waste chapters) and Part III available at www.encapafrika.org/egssaa.htm. In addition to the elements above, training for business development will, where appropriate, incorporate Cleaner Production (CP) approaches and staff providing such training will have a working knowledge of CP concepts and basic CP skills at least equivalent to the content of the USAID/AFR ENCAP training course “Improving Success Rates of MSMEs through Cleaner Production” (www.encapafrika.org/sme.htm).</p>
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<p>Soap-making (training and income generating activities)</p> <p>Village sanitation (trash management, clean-up)</p> <p>Road rehabilitation</p>		<p>Agricultural practices training if applicable will conform to fertilizer best practices as set out in the USAID/AFR Fertilizer Factsheet (available at www.encapafrika.org/egssaa/AFR_Fertilizer__Factsheet_Jun04.pdf)</p> <p>Negative determination subject to the condition that: Training and technical assistance for soap-making activity must address issues of environmental sound practices including handling and storage of hazardous reagents (sodium hydroxide), PPE use, sound waste management practices, as well as occupational health and safety measures.</p> <p>Negative determination subject to the condition that: An environmental sound trash disposal plan must be put in place in accordance with USAID's Environmental Guidelines for Small-Scale Activities in Africa part II (solid waste chapter),as well as occupational health and safety measures.</p> <p>Negative determination subject to the condition that: Small-scale road rehabilitation should be conducted in a manner consistent with the good planning, design and implementation practices described in EGSSAA Part II: Chapter 14: Rural roads (http://www.encapafrika.org/EGSSAA/Word_English/roads.doc).</p>
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<p>Housing rehabilitation/ construction (including training on hen housing construction)</p>		<p>Negative determination subject to the conditions that:</p> <p>This activity must be consistent with the good-practice guidance of USAID’s Environmental Guidelines for Small-Scale Activities in Africa (construction chapter; www.encapafrica.org/egssaa.htm).</p> <p>Carefully choose a site that is not used by local residents; a habitat for key ecosystems, animals or plants; and/or an important scenic, archeological or cultural/historical feature.</p> <p>Avoid sites that are steeply sloped, heavily wooded, or prone to flooding.</p> <p>If minor leveling of land, then design infrastructure will ensure least impact (e.g., Minimize disturbance of native flora during construction, use erosion control measures such as hay bales, gabion, etc.).</p> <p>The proper disposal of construction debris and no use of toxic materials (lead paint, lead or asbestos-containing materials or other toxic/hazardous materials). Any potentially toxic materials used in refurbishment or construction should be properly stored to avoid accidental ingestion by children and animals or contamination of drinking water.</p> <p>The choice of construction materials will not result in the overexploitation of natural materials (e.g., timber felling, sand mining) from local ecosystems.</p>
<p>Tree planting and seedlings nursery establishment</p>		<p>Negative Determination, subject to the condition that</p> <p>No exotic species will be introduced. Only improved seeds and adapted to local conditions approved by the Malian ministry of Environment and Sanitation (Direction Nationale des Eaux et Forêts) will be promoted.</p>

Small Grants Activities

This PDG project will take advantage of small grants programs as a tool to expand their impact. The activities under the small grants programs will be within the scope of activities set out in the sections 3.0 above.

As such, the analysis set out in these sections already examines the environmental impacts of activities to be supported with sub-grants, and sets out recommended determinations and conditions. This analysis applies equally whether the activities are to be conducted directly by a prime contractor/grantee, or via a sub-grant mechanism.

The general conditions of Section 4, below, require that IPs impose these applicable IEE conditions on their sub-grantees, require reporting on these conditions, and monitor their performance. Thus, no separate recommended determinations are necessary or appropriate for sub grant activities.

4.0 RESTRICTION, IMPLEMENTATION AND MONITORING REQUIREMENTS

4.1 GENERAL RESTRICTIONS: PESTICIDES

This IEE does NOT authorize support for pesticides, including their procurement, use, transport, storage or disposal. Any pesticide activity proposed under this program would necessitate an amended IEE, including all elements of analysis required by 22CFR216.3 (b) under USAID Pesticide Procedures.

4.2 GENERAL PROJECT IMPLEMENTATION AND MONITORING REQUIREMENTS

In addition to the specific conditions enumerated in the table above, the negative determination with conditions recommended in this IEE are contingent upon full implementation of the following general monitoring and implementation requirements.

Consideration of Project-level IEEs. This PDG portfolio IEE was developed, as required by USAID project design guidance, during the pre-PAD analysis stage in the project design cycle. As such, it was developed with only relatively general information available regarding proposed activities.

Therefore, for each major PDG procurement, the PDG team, in consultation with the MEO and REA, must consider whether the goal of environmentally sound design and management and clarity and transparency regarding IP and PDG team compliance requirements would be best served by development of a project-level IEE based on far more specific activity descriptions.

Such project-level IEEs would supersede this portfolio IEE for a particular procurement, but would be guided by and establish conditions no less stringent than those set out by this IEE. Such IEEs must incorporate all of the remaining conditions set out in this section.

The PDG team shall provide each PDG Implementing Partner (hereinafter IP), with a copy of this IEE; Each IP shall be briefed on their environmental compliance responsibilities by their cognizant C/AOR. During this briefing, the IEE conditions applicable to the IP's activities will be identified.

As required by ADS 204.5.4, the Mission Peace and Democratic Governance team must actively monitor activities for compliance with approved IEE conditions for implementation, and modify or end activities that are not in compliance.

As part of initial work plan development, Implementing Partners implementing activities under outputs 2.4, 5.1, and 5.2 shall prepare a complete Environmental Review Form (ERF) and Environmental Mitigation and Monitoring plan (EMMP) describing how they will, in specific terms, implement all conditions of this IEE that apply to proposed project activities within their purview.

The EMMP shall include monitoring the implementation of the conditions and their effectiveness. A template for preparation of the EMMP may be accessed online at:
http://www.encapafrica.org/meo_resources/EMMP/Basic%20EMMP%20Template%20Aug2011.doc

The completed EMMP shall be integrated into the initial work plan and subsequent Annual Work Plans, making any necessary adjustments to activity implementation in order to minimize adverse impacts to the environment. Activity Reports shall contain a separate section on implementation of the environmental conditions specified above, and shall assess successes and failures in their implementation.

As part of its initial Work Plan, and all Annual Work Plans thereafter, the Implementing Partners, in collaboration with the USAID Contracting or Agreement Officer Representative (A/COR) and Mission Environmental Officer or Bureau Environmental Officer, as appropriate, shall review all ongoing and planned activities under the project to determine if they are within the scope of this IEE or other approved Regulation 216 environmental documentation.

Any grants or fund transfers from organizations receiving USAID funds to other organizations must incorporate provisions that the activities to be undertaken will be within the scope of the environmental determinations and recommendations of this IEE. If any ongoing activities fall outside the scope of the approved Regulation 216 environmental documentation, the activities shall be halted until an amendment to the documentation is submitted and written approval is received from USAID.

If USAID or the Implementing Partners plan any new activities or substantial modifications to existing activities outside the scope of the approved Regulation 216 environmental documentation, an amendment shall be prepared to the documentation for USAID review and approval. No such new activities shall be undertaken prior to receiving written USAID approval of environmental documentation amendments. The conditions in this section shall be incorporated into the contract language for each mechanism working under the Peace and Democratic Governance project. The management team should consult the paper "Environmental Compliance: Language for use in solicitations and awards" for guidance.

The cognizant USAID team will also ensure that provisions of the IEE concerning mitigative measures and the conditions specified herein along with the requirement to monitor be incorporated in all implementation instruments and sub-agreements issued under these instruments.

IPs shall assure that sub-contracts and sub-grant agreements reference and require compliance with relevant elements of these conditions.

Peace and Democratic Governance activities will be carried out in compliance with environmental regulations and permits of the Malian Government.

If activities are carried out in areas of the country that USAID staff cannot visit because of security concerns, every effort will be made to provide acceptable monitoring and evaluation for environmental compliance. An appropriate plan for monitoring and evaluation will be agreed upon by the A/COR and the Mission Environmental Officer before implementation of activities in insecure areas or within a reasonable amount of time in areas where activities are already being implemented. Current areas of insecurity in Mali are the three northern regions of the country: Timbuktu, Gao and Kidal.

If activities being undertaken in those northern regions present the potential for significant environmental impact, or to impact environmentally sensitive areas, then USAID/Mali will advise the Regional Environmental Advisor and/or the Bureau Environmental Officer of this fact. If acceptable monitoring and evaluation (M&E) of such activities is not possible, then USAID/Mali will suspend such activities until such M&E is once again possible.

Government-to-government (G2G) assistance. In keeping with USAID Forward and a core principle of Feed the Future (FtF), for which USAID/Mali is a focus country, investment in country-led plans is an important value, which may include consideration of sector program assistance (SPA) or other government-to-government assistance. USAID/Mali will need to obtain Authorization for Use of Partner Country Systems (AUPCS)—a new requirement for G2G assistance specified in ADS 220 Use of Reliable Partner Country Systems for Direct Management and Implementation of Assistance. This will include certification of the effectiveness of Mali's environmental assessment procedures, policy and legislative framework. This should be harmonized with the expectations of other sector donors (World Bank, EU, etc.), in line with the Paris Declaration of Aid Effectiveness.