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US AGENCY FOR INTERNATIONAL DEVELOPMENT Office for Afghanistan and Pakistan Affairs

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/ACTIVITY DATA

Country Code and AO: 306-Agriculture
 Assistance Objective Name: A Sustainable, Thriving Agriculture Economy
 Program Objective: To improve production and productivity for wheat, targeted high value crops, and livestock, resulting in improved food security and livelihoods, as well as economic regeneration and sustainable development for rural Afghans

Country or Region: Afghanistan
 Activity Name: Fostering Afghanistan's Sustainable Agribusiness & Livestock (FASAL) Project
 Funding Begin: September 2017
 Funding End: September 2019
 LOP Amount: \$23.2 million
 IEE Prepared by: Jawid Ahmad M Noori
 IEE Date: 5/8/2016
 IEE Amendment: No

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

Categorical Exclusion	<input checked="" type="checkbox"/>	Deferral	<input type="checkbox"/>
Positive Determination	<input type="checkbox"/>	Negative Determination	<input type="checkbox"/>
Negative Determination With Conditions	<input checked="" type="checkbox"/>	Exemption	<input type="checkbox"/>

Climate Change Vulnerability Risk None Low Medium High

1.0 PURPOSE, BACKGROUND AND ACTIVITY DESCRIPTION

1.1 Purpose

The purpose of this IEE, in accordance with 22 CFR 216, is to provide the first review of reasonably foreseeable effects on the environment, as well as the recommended Threshold

Decision for the Fostering Afghanistan's Sustainable Agribusiness & Livestock (FASAL) project.

The IEE provides a brief statement of the factual basis for the Threshold Decision whether an Environmental Assessment or an Environmental Impact Statement is required for the subject activity.

1.2 Background

Agriculture is Afghanistan's economic backbone because it plays a critical role in employing more than 80 percent of the population and contributes 24¹ percent of the country's Gross Domestic Product (GDP) (World Bank Data, 2014). While positive agricultural developments have occurred over the past decade, Afghanistan's productivity and competitiveness in many commodities significantly lags behind neighboring countries and its own historical levels.

In order to advance the transition towards Afghan-led development, the Mission proposes the **Fostering Afghanistan's Sustainable Agribusiness and Livestock (FASAL)** project. The project's aim is to strengthen the capabilities of private enterprises to effectively link Afghan farmers to domestic and international markets. The project's basic premise is that agricultural-led economic growth is the key to rural poverty reduction and lessening the government's dependency on foreign aid. This project should leverage public and private sector investments already made in the country's western provinces.

FASAL should address the demand for agricultural goods and services by partnering with the private sector to develop inclusive, growth-oriented agricultural value chains. The project should forgo elaborate staffing plans and multiple sub-activities and take a focused approach by which the implementer should identify constraints to businesses performance and their corresponding sales and improve production quality within select value chains. FASAL should work as a facilitator among various 'actors' (e.g. farmers, agriculture input providers, millers, traders, buyers) in, at least, three value chains to achieve demand-driven and market based solutions. The project should serve the provinces of: Herat, Farah, Nimroz and Badghis.

1.3. Activity Description

Investments made under FASAL will focus on productivity and value chain facilitation of selected high value crops and wheat, and place the private sector/agribusinesses at the front and center. Trade facilitation efforts for high value crop products will explore the expansion of access to both domestic and international markets. In addition, FASAL will support an assessment of private agribusinesses and address issues of agribusiness capacity to provide inputs and extension services in soil conditioning, pest and disease control, and certified quality seeds, as well as livestock production in the region from a socio-economic perspective. FASAL will build on the successes and lessons learned from past and present USAID investments in the region when implementing the three key components of the program.

¹ <http://data.worldbank.org/indicator/NV.AGR.TOTL.ZS>

Component 1: Increased Wheat Productivity

Wheat Value Chain: The FASAL Implementer will coordinate with the public and private sector to identify and disseminate improved technologies that increase productivity and marketing of wheat.

Wheat Productivity: Wheat is the most important cereal grown in western Afghanistan. Given its importance for household consumption and food security, FASAL will work to improve the productivity by improving agronomic practices such as the appropriate use of fertilizer and other agro-chemicals. Other illustrative activities under FASAL could include:

- **Soil conditioning.** Build capacity of the public and private sector to conduct soil tests, recommend appropriate soil amendments (e.g. application of agricultural lime, use of cover crops to build up organic matter) and provide products and services to support soil conditioning. Improving soil conditions will improve the efficiency of fertilizer utilization and reduce farmers' production costs.
- **Quality control of agricultural inputs.** The FASAL implementer will promote 'truth in labeling' for quality fertilizer and certified seeds. A system is needed to ensure agricultural inputs meet established GIROA standards. For example, the implementer could mobilize wheat farmers to develop standards and incentives for compliance (price premiums), and strengthen the capacity of small-scale milling operators to link with and supply retail outlets. The facilitation of "buyer-seller" relationships by the implementer will elicit agreements between these stakeholders to hold themselves to mutually accountable standards and corresponding premiums.
- **On-farm demonstrations.** Facilitate private sector input companies to fund on-farm demonstration plots to show the effect of using certified seeds to increase farmers' demand for improved seed. The implementer will facilitate the engagement of private input dealers with beneficiaries through farmer field days and visualization of potential benefits from using recommended products as the primary means of farmer capacity building.
- **Private-sector agricultural extension.** Facilitate the development of commercial extension services through networks of input supplier agents and universities in the western region. Leveraging resources from input dealers to support and build farmer capacity is expected to serve two objectives: (i) develop commercial extension service avenues, and (ii) create demand for the products of these input dealers engaged in the extension services. The research and development depths of local universities and faculties will also be considered as a resource in expanding the availability of extension services in the implementation of the project.

Component 2: Improved Production and Profitability of High Value Crops (HVCs).

The FASAL implementer will support a minimum of three high-value crops that will likely have the greatest measurable development impact. Value chain selection will be made in coordination with the local governments, provincial and district level agricultural offices, the private sector and USAID. Illustrative activities under this component can include:

- **Certificated plant materials.** Build capacity of agribusinesses in seed certification and true-to-type labeling of saplings. Facilitate private companies to produce certified saplings and seeds for selected HVCs. Appropriate soil nutrition/conditioning will also be a key feature in the programing and implementation of this intervention in addition to the relevant agronomic practices that would be rolled out under this activity.
- **Integrated Pest Management.** Facilitate the establishment of widespread effective disease and pest management control. The implementer in the performance of this activity will comply with all relevant USAID regulation 216 or environmental compliance policies. A sustainable integrated pest and disease management program will also be explored in the implementation of the activity.
- **Private sector extension services.** Facilitate the development of commercial extension services through networks of input supplier agents. In-kind and in-cash resources from relevant stakeholders, including university faculties will be explored to support beneficiary farmers to produce high quality products which will result in higher incomes.
- **Marketing procedures.** Mobilize stakeholders from across the value chains to produce a common set of production and marketing guidelines. Considering the importance of HVCs in the foreign exchange receipts of Afghanistan, the implementer will ensure production, storage facilities, handling, processing, packaging equipment and materials, and marketing guidelines meet horticultural crop export standards.

Component 3: Enhanced Technology Utilization in the Livestock Industry.

Livestock production in Afghanistan is important from a cultural and economic perspective. This is one sector where women culturally play a major role, and therefore, FASAL will address opportunities for improving women's earnings through targeted livestock activities. Some of the possible interventions include the following:

- **Milk collection depots.** Facilitate the efficient operation of milk collection centers and promote the greater participation of women. Provide assistance in accessing capital, and technical guidance that will stimulate co-investment by Small and Medium Enterprises (SMEs) to expand milk collection centers and modernize them technologically.
- **Artificial insemination.** Facilitate the expansion of the artificial insemination industry by building technical capacity in selected private sector organizations and providing assistance in accessing capital to stimulate co-investment by the private sector in liquid hydrogen technology to increase the number and geographic distribution of livestock.

- **Improved animal nutrition.** Adequate animal feed and feeding program for the livestock and small ruminants which will result in increased milk production.

Component 4: Institutional Capacity Building at Provincial and District Levels

FASAL will provide technical assistance to the western regional District Agriculture, Irrigation, and Livestock (DAIL) organization to identify and reduce administrative system weaknesses. The project will also provide training and mentoring to DAIL staff in effective administrative, financial, and technical management. This will enable the DAIL to be part of the project and play a role in implementing some parts of FASAL for sustainable economic growth.

Best practices, such as environmentally sound designs, proper application of fertilizers, seeds, and pesticides will be followed in consultation with the Mission Environmental Officer (MEO), keeping in mind host-country environmental regulations and laws. This will include lessons learned from other agriculture projects in Integrated Pest Management (IPM), pesticides training, and improved planting and crop management techniques.

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION

2.1 Socio-economic baseline

Afghanistan is located in Central Asia, north and west of Pakistan, and east of Iran. Afghanistan's economy has improved significantly since the fall of the Taliban regime in 2001 largely because of the infusion of international assistance, the recovery of the agricultural sector, and service sector growth. Despite the progress of the past few years, Afghanistan is extremely poor, landlocked, and highly dependent on foreign aid, agriculture, and trade with neighboring countries (Table 1). Much of the population continues to suffer from shortages of housing, clean water, electricity, medical care, and jobs. Insecurity and the Afghan government's inability to extend rule of law to all parts of the country pose challenges to future economic growth. It is expected to take the remainder of the decade, and continuing donor aid and attention, to significantly raise the average Afghan's living standards from the current level, which is among the lowest in the world. While the international community remains committed to Afghanistan's development, pledging over \$24 billion at three donor conferences since 2002, Kabul will need to overcome a number of challenges, including expanding poppy cultivation, budget sustainability, job creation, corruption, government capacity, and rebuilding war Torn infrastructure.

Degradation of the environment and depletion of natural resources are significant and visual consequences of the long period of instability, including depletion of forest cover by 66.5 percent in the south-eastern part of the country over the last 30-year period. Wood is still the main source of energy for over 90 percent of households. Despite the country's challenges, the Afghan government, the United States, and international donors are committed to improving access to basic necessities by prioritizing infrastructure development, education, housing development, jobs programs, and economic reform. Reconstruction projects include national and provincial road construction, water management studies, and alternative power initiatives like micro-hydro power stations.

2.2 Agriculture

Agricultural productivity in western Afghanistan has declined by approximately 3.5% annually as a result of poor soil fertility and farmers inability to access quality inputs. Increased soil erosion and loss of organic matter has exacerbated the low productivity per unit area of land and returns on investments made by Afghan farmers.

The weakened institutional capacity of agribusinesses has plagued the efficient operation of agricultural value chains in the region. A strong private sector is critical for the development of the agricultural sector on two fronts – (i) provision of quality seeds, fertilizer, and extension services to the farmer, and (ii) performance of effective and efficient marketing of farm products. The current limitations of agribusinesses have had a direct impact on food and economic security in Afghanistan’s western region.

Inadequate access to finance is a major constraint to agricultural development. Even the ‘microfinance revolution’ has had limited impact in western Afghanistan and has largely bypassed the agricultural sector. Existing market linkages do not adequately align or respond to the capabilities and potentials of agribusinesses in the western region. The growth of agribusinesses in the region is hampered due to the lack of financial support.

In the livestock sub-sector, private milk processors lack capital or access to the financing necessary to invest in the equipment needed to diversify into ultra-high temperature (UHT) and long-life milk or to finance advertising or carton packaging that would increase demand.

Major challenges do exist in Afghanistan with regards to animal breeding and the full potential of breeding to increase performance is not exploited. Natural mating is a common practice as animals graze together but this involves little selection for improved performance. When farmers keep their animals in a stable, controlled breeding is possible but finding suitable breeds is a challenge. Modern breeding methods like artificial insemination are not yet widely used but this could be one of the efficient ways to address the breeding and production constraints.

Lack of knowledge of feeding practices, combined with feed availability, affordability issues and poor access to feed supplements, leads to insufficient feeding practices for livestock. These issues need to be targeted and addressed to substantially improve the health and weight of livestock and the quality of dairy products.

2.3 Policy, Legal and Regulatory Framework and International Conventions

The primary relevant laws and legislations framing social and environmental issues are: The Environment Law of Afghanistan (2007), the Land Expropriation Law (2005), the Water Law (2004), and the Law on the Preservation of Afghanistan’s Historical and Cultural Heritages (2004).

Afghanistan is a party to international agreements on Biodiversity, Climate Change, Desertification, Endangered Species, Environmental Modification, Marine Dumping, and Ozone

Layer Depletion. The country also signed the agreement for Hazardous Waste, which was recently ratified.

2.4 Environment Law of Afghanistan, 2007

The Environment Law requires the Afghan government to adopt necessary measures to protect natural forests and living conditions of the country. The National Environmental Protection Agency (NEPA) is responsible for the implementation of this law. Following international best practices, NEPA mandates that new activities are screened for potential adverse effects and possible impacts and, if such impacts are likely, a comprehensive mitigation plan is developed for review and approval before the activity can proceed.

In June 2009, NEPA issued the first Afghanistan list of the protected species, which included 46 species.

2.5 Land Expropriation Law (LLE), 2005

The LLE sets out the provisions governing the expropriation or acquisition of land for public interest purposes, such as the establishment/construction of public infrastructure or for acquisition of land with cultural or scientific values, land of higher agricultural productivity and large gardens. It declares, inter alia, that: a) acquisition of a plot or portion of a plot of land for public use is decided by the Council of Ministers and is compensated at fair value based on current market rates (Article 2); b) the right of the owner or land user will be terminated three months prior to the start of civil works on the project and after the proper reimbursement to the owner or person using the land has been made (Article 6); c) the value of land, value of houses and buildings on the land and value of trees and other assets on the land will be considered for compensation (Article 8); and f) compensation is determined by the Council of Ministers. The Law, however, is silent on resettlement. It makes no special provision for a resettlement plan or indeed any arrangements for resettlement.

2.6 Water Law, 2004

The Water Law lays out a model for managing Afghanistan's water resources following the principles of Integrated Water Resources Management (IWRM). The law calls for a nested governance structure for water resources decision-making, including participatory models of community-based management through Water User Associations (WUAs) and Irrigation Associations (IAs), operating within a decision-making framework of River Basin Authorities (RBAs) and River Basin Councils (RBCs) in the five major river basins and 41 sub-basins of the country. It sets out requirements for sustainable water allocation and use, and establishes sanctions and penalties for noncompliance.

2.7 Law on Preservation of Afghanistan's Historical and Cultural Artifacts, 2004

According to The Law on the Preservation of Afghanistan's Historical and Cultural Artifacts, operations that cause destruction or harm to the recorded historical and cultural sites or artifacts is prohibited (Art .11, Art. 16). The law provides guidelines for how to deal with historical and cultural artifacts if they are discovered.

Table 1. Selected data for Afghanistan

Socio-Economic Data	Natural Resources/Environment Data		
Total Population- 35.32 million (in 2011)	Land use	hectares	% of total
Population Growth Rate (annual %)- 2.03	Irrigated agricultural land	3,302,007	5.11%
Urban Population (% of total)- 5.69 million (21.9%)	Orchards	94,217	0.15%
Life Expectancy (years)- 49	Rain-fed Agricultural Land	4,517,714	7.00%
Infant Mortality Rate (per 1,000 live births)- 111	Forest Area	1,337,582	2.07%
GDP (current \$)- 19.5 billion (2011)	Total Pasture Area	29,176,732	45.19%
<u>GDP breakdown:</u> Agriculture 34.9 %, Industry 25 % Services- 40 %	Total Land Other-Arid/Desert	26,131,144	40.48%
GDP Growth (annual %)- 8.5	Total Land Area	64,559,396	
Inflation (annual %)- 4.8	Population Density- 54.70 persons/km2 (in 2011)		
Unemployment Rate (annual %)- 35	<u>Livestock:</u> Cattle: 3.72 million, Sheep: 8.77 million Goats: 7.28 million		
	Deforestation Rate (% of change)- 66.5 % (1971-1999)		
	Improved Water Source (% of pop. with access)- 42%		
	Electricity Consumption - 2.226 billion kWh (2009 est.)		

3.0 RECOMMENDED THRESHOLD DECISIONS

The table below lists proposed program activities covered by all four components in this IEE

Component	Activities	Effects on natural or physical environment	Recommended Threshold Determination

<p>Component 1: Increased Wheat Productivity</p>	<ul style="list-style-type: none"> • Soil conditioning. Build capacity of the public and private sector to conduct soil tests, recommend appropriate soil amendments (e.g. application of agricultural lime, use of cover crops to build up organic matter) and provide products and services to support soil conditioning. Improving soil conditions will improve the efficiency of fertilizer utilization and reduce farmers' production costs. • On-farm demonstrations. Facilitate private sector input companies to fund on-farm demonstration plots to show the effect of using certified seeds to increase farmers' demand for improved seed. The implementer should facilitate the engagement of private input dealers with beneficiaries through farmer field days and visualization of potential benefits from using recommended products as the primary means of farmer capacity building. • Quality control of agricultural inputs. The FASAL implementer could promote 'truth in labeling' for quality fertilizer and certified seeds. A system is needed to ensure agricultural inputs meet established GIRoA standards. For example, the implementer could mobilize wheat farmers to develop standards and incentives for compliance (price premiums), and strengthen the capacity of small-scale milling operators to link with and supply retail outlets. The facilitation of "buyer-seller" relationships by the implementer should elicit agreements between these stakeholders to hold themselves to mutually accountable standards and corresponding premiums. • Private-sector agricultural extension. Facilitate the development of commercial extension services through 	<p>Insignificant effects with mitigation measures</p>	<p>Negative Determination with Conditions: The implementer is required to ensure that farming activities are carried out in an environmentally sound and safe manner following international best practices e.g., USAID Global Environmental Management Support sectorial guidelines, available at http://www.usaidgems.org/sectorGuidelines.htm</p> <p>Mitigating actions can include:</p> <ul style="list-style-type: none"> • An Environmental Manual (EM, see Annex I for suggested sections) will be followed, (see Annex I for suggested sections) will be developed and reviewed by the COR and MEO within 2 months of the award. The EM will include: environmental screening, selection and eligibility criteria, a Framework Environmental Mitigation and Monitoring Plan (EMMP, see Annex II for template and instructions). Potential impacts on the environment and appropriate mitigating measures will be identified (see, for instance, www.usaidgems.org for guidance on irrigation, agriculture and other relevant sectors). If certain activities are identified that pose significant risk, the IEE shall be amended to recommend a positive determination. Such a positive threshold decision will trigger commencement of the EA Process and an Environmental Assessment (EA) shall be conducted by the Implementer prior to start of activities. Details for required steps are provided below in the "Recommended Action." • For grants, an Environmental Request Form and Request Report (ERF/ERR) will be completed by the IP and submitted to the COR and MEO for review and approval before disbursement of funds (see Annex II for template and instructions). • The USAID Afghanistan 2013 Program PERSUAP approved by the BEO, on September 4, 2013, will be adhered to. The IP is
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	<p>networks of input supplier agents and universities in the western region. Leveraging resources from input dealers to support and build farmer capacity is expected to serve two objectives: (i) develop commercial extension service avenues, and (ii) create demand for the products of these input dealers engaged in the extension services. The research and development depths of local universities and faculties should also be considered as a resource in expanding the availability of extension services in the implementation of the project.</p>		<p>expected to follow this PERSUAP.</p>
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<p>Component 2: Improved Production and Profitability of High Value Crops (HVCs).</p>	<p>Certificated plant materials. Build capacity of agribusinesses in seed certification and true-to-type labeling of saplings. Facilitate private companies to produce certified saplings and seeds for selected HVCs. Appropriate soil nutrition/conditioning should also be a key feature in the programing and implementation of this intervention in addition to the relevant agronomic practices that would be rolled out under this activity.</p> <p>Integrated Pest Management. Facilitate the establishment of widespread effective disease and pest management control. The implementer in the performance of this activity should comply with all relevant USAID regulation 216 or environmental compliance policies. A sustainable integrated pest and disease management program should also be explored in the implementation of the activity.</p> <p>Private sector extension services. Facilitate the development of commercial extension services through networks of input supplier agents. In-kind and in-cash resources from relevant stakeholders, including university faculties should be explored to support beneficiary farmers to produce high quality products which could result in higher incomes.</p>	<p>Insignificant effects with mitigation measures</p>	<p>Negative Determination with Conditions: The implementer is required to ensure that farming activities are carried out in an environmentally sound and safe manner following international best practices e.g., USAID Global Environmental Management Support sectorial guidelines, available at http://www.usaidgems.org/sectorGuidelines.htm</p> <ul style="list-style-type: none"> • For grants, an Environmental Request Form and Request Report (ERF/ERR) will be completed by the IP and submitted to the MEO for review and approval before disbursement of funds (see Annex II for template and instructions). • The USAID Afghanistan 2013 Program PERSUAP approved by the BEO, on September 4, 2013, will be adhered to. The IP is expected to submit list of requested pesticides to the MEO and D-MEO for review and approval. • Genetically Modified Organisms (GMOs) will not be introduced. Any non-native species will be introduced in strict adherence to Ministry of Agriculture, Irrigation and Livestock protocols following established biosafety and non-native analysis. In no cases will funding be used to purchase ammonium nitrate or calcium ammonium.
	<p>Marketing procedures. Mobilize stakeholders from across the value chains to produce a common set of production and marketing guidelines. Considering the importance of HVCs in the foreign exchange receipts of Afghanistan, the implementer should ensure production, storage facilities, handling, processing, packaging equipment and materials, and marketing guidelines meet horticultural crop export standards.</p>	<p>No Impact</p>	<p>Categorical Exclusion, no actions required per: 22 CFR 216.2(c)(2)(i), (iii), and (v)</p>

<p>Component 3: Enhanced Technology Utilization in the Livestock Industry.</p>	<p>Milk collection depots. Facilitate the efficient operation of milk collection centers and promote the greater participation of women. Provide assistance in accessing capital, and technical guidance that will stimulate co-investment by SMEs to expand milk collection centers and modernize them technologically.</p> <p>Artificial insemination. Facilitate the expansion of the artificial insemination industry by building technical capacity in selected private sector organizations and providing assistance in accessing capital to stimulate co-investment by the private sector in liquid hydrogen technology to increase the number and geographic distribution of livestock.</p> <p>Improved animal nutrition. Adequate animal feed and feeding program for the livestock and small ruminants which will result in increased milk production.</p>	<p>Insignificant effects with mitigation measures</p>	<p>Negative Determination with Conditions: The implementer is required to ensure that farming activities are carried out in an environmentally sound and safe manner following international best practices e.g., USAID Global Environmental Management Support sectorial guidelines, available at http://www.usaidgems.org/sectorGuidelines.htm</p> <ul style="list-style-type: none"> • For grants, an Environmental Request Form and Request Report (ERF/ERR) will be completed by the IP and submitted to the MEO for review and approval before disbursement of funds (see Annex II for template and instructions).
<p>Component 4: Institutional Capacity Building at Provincial and District levels</p>	<ul style="list-style-type: none"> • Technical assistance to the western regional District Agriculture, Irrigation, and Livestock (DAIL) organization • Mentoring to DAIL staff on effective administrative, financial, and technical management. 	<p>No Impact</p>	<p>Categorical Exclusion, no actions required per: 22 CFR 216.2(c)(2)(i), (iii), and (v)</p>

4.0 CLIMATE CHANGE RISK SCENING –

Afghanistan is extremely vulnerable to the impacts from global climate change. Temperatures have been rising and are expected to rise even more and there is an increase in the frequency of extreme weather events such as droughts and rainstorms which may affect water availability and affect crop and livestock production. To minimize the negative impacts of climate change, USAID is required by Executive Order 13677 to incorporate climate change risk screening for all new projects as of October 1, 2016. FASAL is a new project, so climate change risk screening analysis will be beneficial as it may help the project to adjust its activities to better adapt to climate change and maximize results.

Annex IV is a partially completed risk screening that the implementer is expected to complete before December 31, 2016, with a supporting narrative on how climate change will be streamlined across project activities. Activities identified will not proceed until screening is completed and reviewed by MEO.

5.0 ENVIRONMENTAL RECOMMENDATIONS

Categorical Exclusion (approximately 90 percent of funding)

Pursuant to 22 CFR 216.2(c)(3), the “core” program activities under all components of FASAL, which include technical assistance, participant training, information dissemination, and other similar environmentally neutral actions, consist of types of interventions entirely within the categories listed in paragraph (c) (2), “Categorical Exclusions,” of Section 216.2, “Applicability of Procedures,” of Title 22 CFR Part 216, and, therefore, are excluded categorically from any further environmental review requirements. The originator of the proposed action has further determined the proposed activities are fully within the following classes of actions:

- Education, technical assistance, or training programs except to the extent such program includes activities directly affecting the environment (such as construction of facilities, etc.) 22 CFR 216.2(c)(2)(i);
- Analyses, studies, academic or research workshops and meetings 22 CFR 216.2(c)(2)(iii);
- Document and information transfers 22 CFR 216.2(c)(2)(v); and
- Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.) 22 CFR 216.2(c)(2)(xiv).

Negative Determination with Conditions (approximately 10 percent of all funding)

The Implementer will develop an Environmental Manual (EM) that provides guidance in the implementation of required environmental compliance process for the project. The EM will be reviewed and approved by the COR and MEO within two months of the award before implementation of activities and will be translated into Dari and Pashtun. Suggested sections to be included in the EM are given in Annex I. If certain activities are identified that pose significant risk, the IEE shall be amended to recommend a positive determination. Such a positive threshold decision will trigger commencement of the EA Process and an Environmental Assessment (EA) shall be conducted by the Implementer prior to start of activities. Details for required steps are provided below in the “Recommended Action.”

The EM will address the following:

Small-scale activities that have a potential for an adverse impact on the natural or physical environment: The Implementer will include in the EM an Environmental Mitigation and Monitoring Plan (EMMP) for activities implemented by FASAL adapted to a specific region or site before the activity implementation. An EMMP template is provided in Annex II.

Grants: For grants, an Environmental Request Form and Request Report (ERF/ERR) will be completed by the IP and submitted to the MEO before disbursement of funds (see Annex III for template and instructions). If the ERF/ERR results in a finding in which significant adverse effects are confirmed, an environmental assessment (EA) will be conducted. This assessment will include the following steps: 1) SOW for Scoping will be approved by the BEO/OAPA; 2)

public consultation will take place at Scoping: 3) the Scoping Statement may result in (a) confirming potentially significant adverse environmental and social impacts and, thus, the SS shall have a SOW for the EA and must be approved by the BEO/OAPA; or in finding (b) no potentially significant adverse environmental and social impacts are expected, in which case, the Positive Threshold Decision would be reversed and an EMMP prepared; 4) the draft EA report is prepared if required and public consultation is conducted, 5) EA Report with EMMP must be approved by the BEO/OAPA. Note that the COR may decide not to fund the grant, in which case an EA will not be necessary.

Pesticides: for the safe use of pesticides, FASAL is expected to follow the Mission-wide Programmatic PERSUAP ([USAID Afghanistan 2013 Program PERSUAP](#)) that was approved in September 2013. The MEO and D-MEO will review and approve the list or requested pesticides. In no cases will funding be used to purchase ammonium nitrate or calcium ammonium.

Genetically Modified Organisms (GMOs): FASAL will not introduce GMOs unless there is an approved Biosafety policy and regulatory framework in Afghanistan. At present, no such policy or regulation is available or is being planned by the GIRA.

6.0 LIMITATIONS OF THE IEE

This assistance does not cover activities involving:

1. Procurement or use of genetically modified organisms (GMOs) which will require preparation of a bio-safety assessment (review), in accordance with ADS 201.3.9.3b in an amendment to the IEE approved by BEO/OAPA.
2. Procurement or use of Asbestos, Lead and Mercury Containing Materials (ALCM) (e.g., piping, roofing), Polychlorinated Biphenyl's (PCB) or other hazardous materials prohibited by US EPA as provided at: <http://www.epa.gov/asbestos> and/or under international environmental agreements and conventions, e.g. Stockholm Convention on Persistent Organic Pollutants as provided at: <http://chm.pops.int>.
3. Procurement, use or recommendation for use of AN and CAN fertilizers.
4. Procurement, use, or recommendation for use of pesticides both in agriculture and construction shall be done in accordance with BEO/OAPA approved P-PERSUAP and if warranted an Amendment shall be prepared.
5. All materials used in refurbishment of buildings and offices shall comply with ADS Chapter 312, Eligibility of Commodities, <https://www.usaid.gov/sites/default/files/documents/1876/312.pdf>.
6. Procurement or use of non-native, potentially invasive species.

7.0 REVISIONS

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that activities to be funded by the program might be "major" and the program's effect "significant," or if additional activities are proposed that might be considered "major" and their effects significant, this IEE will be reviewed and revised by the originator of the project and submitted to the Bureau Environmental Officer (BEO) for approval and, if appropriate, an environmental assessment will be prepared. It is the responsibility of the USAID COR/AOR to keep the Mission Environmental Officer, USAID/Afghanistan and the BEO/OAPA informed of any new information or changes in scope and nature of the activity that might require revision of the IEE.

APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS

Fostering Afghanistan's Sustainable Agribusiness & Livestock (FASAL) Project

CLEARANCES:

	<u>Clearances:</u>	<u>Date:</u>
AOR/COR	<u>Cleared in tracker</u> Anafrida Bwenge	<u>6/14/2016</u>
Acting Office Director, OAG	<u>Cleared in tracker</u> McDonald Homer	<u>6/16/2016</u>
Mission Environmental Officer	<u>Cleared by email</u> Harry Bottenberg	<u>6/13/2016</u>
Regional Environmental Advisor for the Central, South, Asia and OAPA	<u>Cleared by email</u> Andrei Barannik	<u>6/12/2016</u>
Office Director, RLO	<u>Cleared in tracker</u> Haven Cruz-Hubbard	<u>6/20/2016</u>
Acting Deputy Mission Director	<u><i>Susan Kutor</i></u> Susan Kutor <i>with edits</i>	<u><i>6/22/2016</i></u>
Mission Director	<u><i>[Signature]</i></u> Herbert Smith	<u><i>6/22/2016</i></u>
APPROVAL:		
Acting Bureau Environmental Officer for Afghanistan and BEO/ME	<u><i>John Wilson</i></u> John Wilson	<u><i>6/28/16</i></u>

DISTRIBUTION: MEO, COR/AOR, OAA, RLO

Annex I

Environmental Manual

Suggested sections

- **Section 1 – Introduction.** Objectives and goals of the Manual;
- **Section 2 – Program Description.** This section will summarize the components and tasks of the RDAP sub-project. Potential projects and their activities will also be indicated;
- **Section 3 – Compliance Process.** Section Three will summarize USAID environmental procedures, the findings of the FASAL IEE and propose methodologies for adoption of the Environmental Due Diligence (EDD) process (use of the Environmental Request Form and Request Report), Environmental Assessment (EA) and PERSUAP. The methods of monitoring and reporting will also be outlined along with any requirements for additional environmental training.
- **Section 4 – Framework Environmental Mitigation and Monitoring Plan.** This final section will outline how mitigation and monitoring will be applied to project activities.
- **Annex A – IEE.** This annex provides the IEE in full.
- **Annex B – Determinations.** Annex B will provide an outline of all the proposed and potential FASAL project and assign them an initial determination decision based on the IEE recommendations. This Annex will be subject to periodic updates as needed.
- **Annex C – References and Guidelines.** This Annex provides details of the references and guidelines applicable to projects outlined in Annex A. The aim of this Annex is to provide guidance for the writer of the EDD / EA.
- **Annex D – Report Templates.** Annex D provides a template for the EDD process.
- **Annex E – Host Country Regulations.** This Annex will provide a description of the EA regulations of Afghanistan and also an outline of any other relevant environmental regulations or permits to the FASAL (sub-component).
- **Annex F - Small Scale Guidelines.** This annex quotes directly from the IEE and can be used to develop mitigation measures for small scale construction and operational activities.
- **Annex G – Main Environmental Problems Nationally and in Target Areas.** This section will provide an overview of the general environmental conditions in Afghanistan and within the target areas. This section of the manual will be continually updated as the program develops across the country

Annex II

Environmental Mitigation and Monitoring Plan (EMMP)

The EMMP must be completed by each organization carrying out activities under the USAID/Afghanistan XXX Program. It will include the organization's own report plus the EMMPs of any sub-awardees, to capture the entire range of activities funded by the USAID/Afghanistan XXXX Program under the award. The USAID/Afghanistan XXXX Program, implementing partners are responsible for ensuring that each sub-awardee completes and submits the EMMP to the prime in a timely fashion. The EMMPs are reviewed and approved by the COTR/AOTR and the Mission Environmental Officer.

The EMMP consists of 3 parts:

1. The Environmental Verification Form
2. The Mitigation Plan for specific environmental threats carried out by the implementer
3. The Reporting Form

The EMMP Environmental Verification Form

This form indicates the categories of activities carried out by implementing partners (or their sub-awardees) and serves to 'trigger' USAID expectations of mitigation measures.

The EMMP Mitigation Plan

Implementing partners will use the Mitigation Plan to describe the specific actions they will undertake under each category of activity when screening reveals potential environmental threats as outlined in Section 3 of this IEE. In these cases, mitigation will be undertaken as described in Section 5, Table 4 of this IEE. The Mitigation Plan also identifies the person responsible for monitoring compliance with mitigation and the indicator, method and frequency of monitoring.

The EMMP Reporting Form

This form reports on the results of applying the mitigation measures described in the Mitigation Plan and identifies outstanding issues with respect to required conditions. In some cases, digital photos will be the best way to document mitigation and will be included in the report.

EMMP Part 1 of 3: Environmental Verification Form

Name _____

Date of Screening: _____

Name of Prime Implementing Organization: _____

Funding Period for this award: FY ____ - FY ____

Name of Sub-awardee Organization (if this EMMP is for a sub): _____

Current FY Resource Levels: FY _____

This report prepared by: Name: _____ Date: _____

Geographic location of USAID-funded activities (Province, District): _____

Date of Previous EMMP for this organization: _____ (if any)

Indicate which activities your organization is implementing under this funding:

Key Elements of Program/Activities Implemented		Yes	No
1	<ul style="list-style-type: none"> • education, technical assistance or training programs • analyses, studies, academic or research workshops and meetings; • document and information transfers; • Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.); 		
2	Development and dissemination of improved agricultural production technologies for selected crops and livestock		
3	Increased agricultural production		
4	Seeds, Germplasm, Exotic Species		
5	Dissemination of biotechnology products		
6	Small-scale construction or rehabilitation of buildings and water & sanitation infrastructure		
7	Sub-Grants		

EMMP Part 2 of 3: Environmental Mitigation and Monitoring Plan

Category of Activity	Describe specific environmental threats of your organization's activities (based on analysis in Section 3 of the IEE)	Description of Mitigation Measures for these activities as required in Section 5 of IEE	Who is responsible for monitoring	Monitoring Indicator	Monitoring Method	Frequency of Monitoring

EMMP part 3 of 3: Reporting form

List each Mitigation Measure from column 3 in the EMMP Mitigation Plan (EMMP Part 2 of 3)	Status of Mitigative Measures	List any outstanding issues relating to required conditions	Remarks

Certification

I certify the completeness and the accuracy of the mitigation and monitoring plan described above for which I am responsible and its compliance with the IEE:

Signature

Date

Print Name

Organization

BELOW THIS LINE FOR USAID USE ONLY

USAID/Afghanistan, _____ Program, Clearance of EMMP:

Cognizant Technical Officer: _____ Date: _____

Mission Environmental Officer: _____ Date: _____

As appropriate: REA, BEO [depending on nature of activity, which potentially may require an EA]

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

Environmental Review Form for subprojects/subgrants

A. Applicant information

Organization	Parent grant or project
Individual contact and title	Address, phone & email (if available)
Proposed subproject /subgrant (brief description)	Amount of funding requested
	Period of performance
	Location(s) of proposed activities

B. Activities, screening results, and findings

Proposed activities (Provide DESCRIPTIVE listing. Continue on additional page if necessary)	Screening result (Step 3 of instructions)			Findings (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities ONLY)		
	Very Low Risk	High-Risk*	Moderate or unknown risk*	significant adverse impacts are very unlikely	With specified mitigation, significant adverse impacts are very unlikely	Significant Adverse impacts are possible
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						

*These screening results require completion of an Environmental Review Report

C. Certification:

I, the undersigned, certify that:

1. The information on this form and accompanying environmental review report (if any) is correct and complete.
2. Implementation of these activities will not go forward until specific approval is received from the C/AOTR.
3. All mitigation and monitoring measures specified in the Environmental Review Report will be implemented in their entirety, and that staff charged with this implementation will have the authority, capacity and knowledge for successful implementation.

(Signature) _____ (Date) _____

(Print name) _____ (Title) _____

Note: if screening results for *any activity* are “high risk” or “moderate or unknown risk,” this form is not complete unless accompanied by an environmental review report.

BELOW THIS LINE FOR USAID USE ONLY

Notes:

1. For clearance to be granted, the activity MUST be within the scope of the activities for which use of the ERF is authorized in the governing IEE. Review IEE before signature. If activities are outside this scope, deny clearance and provide explanation in comments section. The Partner, C/AOTR, MEO and REA must then confer regarding next steps: activity re-design, an IEE or EA.
2. Clearing an ERF containing one or more findings that **significant adverse impacts are possible** indicates agreement with the analysis and findings. It does NOT authorize activities for which “significant adverse impacts are possible” to go forward. It DOES authorize other activities to go forward. The Partner, C/AOTR, MEO and REA must then confer regarding next steps: activity re-design, an IEE or EA.

Clearance record

C/AOTR <input type="checkbox"/> Clearance given <input type="checkbox"/> Clearance denied	(print name)	(signature)	(date)
USAID/Afghanistan MEO <input type="checkbox"/> Clearance given <input type="checkbox"/> Clearance denied	(print name)	(signature)	(date)
Regional Env. Advisor (REA) <input type="checkbox"/> Clearance given <input type="checkbox"/> Clearance denied	(print name)	(signature)	(date)
Bureau Env. Officer (BEO)* <input type="checkbox"/> Clearance given <input type="checkbox"/> Clearance denied	(print name)	(signature)	(date)

C/AOTR, MEO and REA clearance is required. BEO clearance is required for all “high risk” screening results and for findings of “significant adverse impacts possible. The BEO may review ”

Note: if clearance is denied, comments must be provided to applicant (use space below & attach sheets if necessary)

Environmental Review Report

- A. Summary of Proposal.** *Very briefly summarize background, rationale and outputs/results expected. (Reference proposal, if appropriate).*
- B. Description of Activities.** *For all moderate and high-risk activities listed in Section B of the ERF, 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. Site-specific Environmental Situation & Host Country 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?*
- Also note applicable host country environmental regulations and/or policies. (For example, does the project require host country environmental review or permitting? Building approval? Etc.)*
NOTE: provide site-specific information in this section, NOT country-level information. General information about country level conditions will already be contained in the IEE governing the XXX project/program.
- D. Environmental Issues, Mitigation Actions, and Findings.** *Using the table provided, identify all potential impacts for each activity. These must include all phases (planning & design, construction and handover, operation, and decommissioning). 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 also positive impacts and how the natural resources base will be sustainably improved. Identify actionable mitigation actions to avoid, reduce or compensate for negative impacts, such as restoration of borrow or quarry areas, replanting of vegetation, compensation for any relocation of homes and residents. Mitigation actions will be assigned to the responsible party, for example the construction contractor, the implementing partner, the beneficiaries.*

Project Phase and Activity	Potential Environmental Impact	Mitigation Action
Planning and Design		
Construction and Handover		
Operation		

Decommissioning		

E. Environmental Mitigation and Monitoring Plan (EMMP). *Set out how compliance with mitigation actions will be monitored/verified. This includes specifying WHO will be responsible for the various mitigation actions, and HOW implementation of the mitigation actions will be tracked/verified.*

Also specify how you will report to USAID on the implementation of mitigation actions. (You are REQUIRED to provide your C/AOTR with sufficient information on the status of mitigation implementation for USAID to effectively fulfill its oversight and performance monitoring role.)

Again, choose a format and structure that presents the necessary information clearly and succinctly. EMMPs are typically in table format, and often include a compliance log or “monitoring record” section that records implementation status of the various mitigation actions. The EMMP with current monitoring log can then simply be submitted to the C/AOTR with the quarterly or 6-month project report, satisfying the environmental compliance reporting requirement. .

The most basic EMMP format is

Mitigation action	Responsible Party	Monitoring/Verification Method	Monitoring Record (date, result, corrective actions taken, if any)

For additional EMMP formats and examples, see the ENCAP EMMP factsheet, available via www.encapafrika.org/meoEntry.htm

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)*

ANNEX IV

Fostering Afghanistan’s Sustainable Agribusiness & Livestock (FASAL) activity climate change risk screening (to be completed by IP).

Component	Defined/ Illustrative Interventions	Risks List all risks related to defined/ illustrative interventions that were identified in the screening and additional analysis (to be revised if necessary by IP)	Risk Rating High/ Moderate/ Low: to be completed by IP	How Risks are Addressed To be completed by IP: Describe how the risks have been addressed and/ or additional steps that will be taken to address the risk. If you have chosen to accept the risk, briefly explain why.
Component 1: Increased Wheat Productivity	• Quality control of agricultural inputs.	• Damage of agricultural infrastructure due to flooding		
	• Private-sector agricultural extension	• Increased soil erosion due to flooding		
	• Soil conditioning.	• Soil salinity		
	• On-farm demonstrations	• Reduced yields		
	• Quality control of agricultural inputs.	• Changes in the incidence of crop Pests and livestock diseases		
Component 2: Improved Production and Profitability of the High Value Crop (HVCs).	• Certificated plant materials	• Decreased soil fertility		
	• Integrated Pest Management	• Heat stress for livestock and field workers		
	• Private sector extension services Marketing procedures	• Etc		
Component 3: Enhanced Technology Utilization in the Livestock Industry.	• Milk collection depots. • Artificial insemination. • Improved animal nutrition	• Etc		
Component 4: Institutional Capacity building at provincial and district levels	• Technical support to DAILs			

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Templates

Date Tasked 6/21/2016

Guidance

Due Date 6/26/2016 12:00 AM

Biography

Status Submitted to DMD for ClearancePriority High**Lists**Assigned Section/Office MEO

TTClearancePage

Assigned POC/Drafter [Sultani, Mohammad Mustafa \(Kabul\)](#) 

USAID Task Tracker

Assigned POC/Drafters old

TT Clearance Page

Clearing Section/Office DMD

Tasks

Clearing POC [Kutor, Susan K \(Kabul\)](#)

TT Clearance Page

With Input From

Tasks 1

Final Destination OAPA**Discussions**Paper Type IEE

Team Discussion

Status/Comments

[Sultani, Mohammad Mustafa \(Kabul\)](#)  (6/21/2016 8:44 AM): Hi Susan, would you please review and clear FASAL IEE.

[Cruz-Hubbard, Haven](#)  (6/20/2016 1:40 PM): Clear for RLO. No edits or changes.

[Sultani, Mohammad Mustafa \(Kabul\)](#)  (6/19/2016 8:40 AM): Hello Haven, would you please review and clear FASAL IEE

[Homer, McDonald C. \(Kabul\)](#)  (6/16/2016 5:27 PM):

[Sultani, Mohammad Mustafa \(Kabul\)](#)  (6/14/2016 10:53 AM): Hi Mac, would you please review and clear FASAL IEE.

[Bwenge, Anafrida N \(Kabul\)](#)  (6/14/2016 10:48 AM): Cleared by the COR, no comments

[Sultani, Mohammad Mustafa \(Kabul\)](#)  (6/12/2016 2:58 PM): Hi Frida, could you please review and clear FASAL IEE.

[Sultani, Mohammad Mustafa \(Kabul\)](#)  (6/12/2016 2:54 PM): Hi Frada,

Could you please review and clear FASAL IEE.

Date Completed 6/24/2016Task Year 2016Date Due 26/06/2016Tasked Date 21/06/2016

Attachments

[Andre's clearance- Re_ FASAL IEE.pdf](#)

[FASAL IEE 6-12-2016.docx](#)

[Harry's clearance 6-13-2016 - Re_ FASAL IEE.pdf](#)

[Harry's clearance- Re_ FASAL IEE.pdf](#)

Content Type: Item

Version: 17.0

Created at 6/12/2016 2:54 PM by [Sultani, Mohammad Mustafa \(Kabul\)](#) Last modified at 6/21/2016 8:45 AM by [Sultani, Mohammad Mustafa \(Kabul\)](#) 

Close



Mohammad Mustafa Sultani <msultani@usaid.gov>

Re: FASAL IEE

1 message

Harry Bottenberg <hbottenberg@usaid.gov>
To: Mohammad Mustafa Sultani <msultani@usaid.gov>

Mon, Jun 13, 2016 at 4:09 PM

Go ahead and load this up in the mission tracker and start clearances. I clear.

Sent from my iPhone

On Jun 13, 2016, at 1:15 AM, Mohammad Mustafa Sultani <msultani@usaid.gov> wrote:

Hi Harry,

Please find attached FASAL IEE for your review. I added suggested language under Limitations of the IEE section.

Best Regards,
Mustafa

On Sun, Jun 12, 2016 at 9:43 PM, Harry Bottenberg <hbottenberg@usaid.gov> wrote:
Thanks, Andrei.

Mustafa, pls add the suggested language, I will review tomorrow or Tuesday (am taking Monday off but will check emails).

Sent from my iPhone

On Jun 12, 2016, at 5:34 AM, Andrei Barannik <abarannik@usaid.gov> wrote:

Harry - you need to add into "Limitations . . ." non-native, potentially invasive species. With this I clear and ready to signatures in the Mission and review and concurrence by John Wilson, Acting BEO/Afghanistan and BEO/ME. W/r, Andrei

On 8 June 2016 at 23:52, Harry Bottenberg <hbottenberg@usaid.gov> wrote:
Made one correction in the spelling of my name.

Andrei, can you review again?

harry

On Tue, Jun 7, 2016 at 6:49 AM, Jawid Ahmad Noori <janoori@usaid.gov> wrote:

Hello Andrei and Mustafa,
Please find attached revised IEE for your review and clearance, The project will use ERF clearance for all the grants before it is awarded to the grantee.



Mohammad Mustafa Sultani <msultani@usaid.gov>

Re: FASAL IEE

1 message

Andrei Barannik <abarannik@usaid.gov>

Sun, Jun 12, 2016 at 2:04 PM

To: Harry Bottenberg <hbottenberg@usaid.gov>

Cc: Mohammad Mustafa Sultani <msultani@usaid.gov>, Anafrida Bwenge <abwenge@usaid.gov>, Jawid Ahmad Noori <janoori@usaid.gov>

Harry - you need to add into "Limitations . ." non-native, potentially invasive species. With this I clear and ready to signatures in the Mission and review and concurrence by John Wilson, Acting BEO/Afghanistan and BEO/ME.
W/r, Andrei

On 8 June 2016 at 23:52, Harry Bottenberg <hbottenberg@usaid.gov> wrote:

Made one correction in the spelling of my name.

Andrei, can you review again?

harry

On Tue, Jun 7, 2016 at 6:49 AM, Jawid Ahmad Noori <janoori@usaid.gov> wrote:

Hello Andrei and Mustafa,

Please find attached revised IEE for your review and clearance, The project will use ERF clearance for all the grants before it is awarded to the grantee.

Thanks,

On Tue, Jun 7, 2016 at 2:12 PM, Mohammad Mustafa Sultani <msultani@usaid.gov> wrote:

Hi Jawid,

Please find attached FASAL IEE, some of Andrei's comments have been addressed by MEO. Please address two remain comments, and then send it back to Harry and Andrei for their final review and clearance.

Best Regards,
Mustafa

On Wed, Jun 1, 2016 at 5:49 PM, Harry Bottenberg <hbottenberg@usaid.gov> wrote:

I have addressed most but not all of Andrei's comments and rearranged the Country Info and background info (inserted the background into the country info). Pls clean up and format properly, make sure the section numbers and page numbers are consecutive, tables look clean and text lined up properly. Some of the country info needs beefing up, have OAG provide more detail. Re-insert the references in the country info section from the IEE Template. The PERSUAP needs the hyperlink, you can put it as a footnote so you can see it when the document is printed (not an embedded hyperlink).

I have added a line for climate screening on the face sheet (I gave it a rating of "High").

After Ag is done with this it can go back to me and then Andrei can re-review.

On Tue, May 24, 2016 at 2:02 PM, Harry Bottenberg <hbottenberg@usaid.gov> wrote:

Let me work on this tomorrow and send to Andrei.