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US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE) –Promoting Gender Equity and Empowerment
Through Education

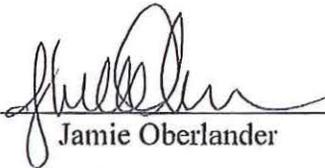
Program/Project/Activity Data:

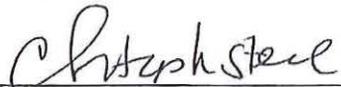
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| Activity/Project Title: Promoting Gender Equity and Empowerment Through Education | | Solicitation #: N.A. |
| Contract/Award Number (if known): N.A | | |
| Geographic Location : Pakistan; 391 | | |
| Originating Bureau/Office: USAID Pakistan, Office of Education | | |
| Supplemental IEE: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | DCN and date of Original document: N.A | |
| Amendment: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | DCN and ECD link(s) of Amendment(s): N.A | |
| Programmatic IEE: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Amendment No.: N.A | |
| Funding Amount: \$150,000,000 | Life of Project Amount: \$150,000,000 | |
| Implementation Start/End: December 01, 2016 – December 31, 2020 | | |
| Prepared By: Jamie Oberlander | Date Prepared: September 27, 2016 | |
| Expiration Date (if any): December 31, 2021 | Reporting due dates (if any): N.A. | |
| Environmental Media and/or Human Health Potentially Impacted (check all that apply): None <input type="checkbox"/> Air <input checked="" type="checkbox"/> Water <input checked="" type="checkbox"/> Land <input checked="" type="checkbox"/> Biodiversity <input checked="" type="checkbox"/> Human Health <input checked="" type="checkbox"/> Other <input checked="" type="checkbox"/> | | |
| Recommended Threshold Determination: | | |
| <input checked="" type="checkbox"/> Negative Determination <input checked="" type="checkbox"/> with conditions | <input type="checkbox"/> Deferral | |
| <input checked="" type="checkbox"/> Categorical Exclusion | <input type="checkbox"/> Exemption | |
| <input type="checkbox"/> Positive Determination | <input type="checkbox"/> USG Domestic NEPA action | |
| Climate Change: | | |
| <input type="checkbox"/> GCC/Adaption | <input type="checkbox"/> GCC/Mitigation | <input checked="" type="checkbox"/> Climate Change Vulnerability Analysis (included) |
| Adaptation/Mitigation Measures: Recommendations included | | |

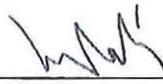
**US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE) – PGEE PAD**

CLEARANCE / APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

CLEARANCE:

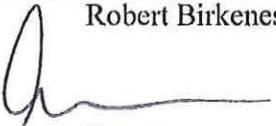
Activity Manager:  Date: 10/24/2016
Jamie Oberlander

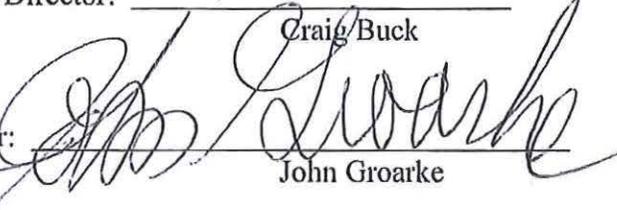
Office Director:  Date: 24 Oct 16
Christopher Steel

Mission Environmental Officer:  Date: 10/24/2016
Howard Batson

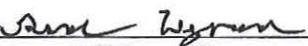
Regional Environmental Advisor: Cleared in draft Date: 10/23/2016
SCA & OAPA Andrei Barannik

Office Director:  Date: 24 OCT 2016
(OPM) Robert Birkenes

Deputy Mission Director:  Date: 10-26, 2016
Craig Buck

Mission Director:  Date: 
John Groarke

CONCURRENCE:

Bureau Environmental Officer:  Date: 11/2/16
(OAPA) ~~William Gibson~~
Gordon Weynand

Distribution: 1). Project files, 2). Mission IEE Data base, 3). OAA, 4). RLA



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| Adaptation/Mitigation Measures: Recommendations included | | |

**US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE) – DO4 PAD**

SUMMARY OF FINDINGS:

The Initial Environmental Examination for Promoting Gender Equity and Empowerment through Education (PGEEE) Project (“the Project”) consists of new and existing activities. All existing activities have approved IEEs and are documented in Section 7.1.1 of this IEE. The Life of Project budget is \$150 million, \$51 million in existing activities and \$99 million in new activities. Of the new activities, \$19 million will be procured in the near-term for the Let Girls Learn (LGL)-Pakistan activity which supports the LGL Presidential Initiative, and up to \$80 million in additional activities planned in response to emerging needs in line with LGL objectives. The recommended Environmental Threshold Determination (ETD) for LGL activities is a Categorical Exclusion, and Negative Determination with Conditions.

1 Background and Project/Activity Description:

1.1 Purpose and Scope of IEE

The purpose of this Initial Environmental Examination, in accordance with 22 CFR 216, is to provide the first review of the reasonably foreseeable effects on the environment and to recommend **Threshold Decisions** for the activities that will be implemented under the PGEEE Project Appraisal Document (PAD).

1.2 Background

The PGEEE Project is designed to support the Let Girls Learn Presidential (LGL) Initiative which has the objective of: 1) Increasing Access to Quality Education, 2) Reducing Barriers to Success, and 3) Empowering Adolescent Girls. The PAD includes a mix of existing and new USAID/Pakistan activities that will improve quality education through teacher training, teaching the foundational skill of reading, and the provision of quality teaching and learning materials, with a specific focus on adolescent girls. Existing activities also seek to improve access to quality education through the construction of girls’ primary and secondary schools and renovation of schools to accommodate girls’ needs, as well as increase school safety, increase enrollment, and provide technical assistance for school consolidation and management. The new activities have not yet been fully developed and will be further identified and approved through an activity approval process under the PAD. This PGEEE PAD, therefore, is intended to serve as a planning document for activities aligned with the objectives of the Mission Strategic Framework, the White House Let Girls Learn initiative, the USAID Gender Policy, and USAID’s Global Education Strategy. Within the Mission’s Strategic Framework, PGEEE supports two Development Objectives (DOs), DO2: Economic Growth – Improved Economic Status of Focus Populations, and DO 4: Improved Opportunities for Learning and Work. The PAD largely supports DO4 with the Mission’s Education Office leading the design and management of activities under the PAD.

To increase gender equity in education and women's empowerment, PGEEE activities will include, and supplement existing Mission efforts to address key barriers that adolescent girls and young women face in Pakistan due to poverty, cultural norms, geographic isolation, and security concerns. PGEE activities will be nationwide in scope, with a focus on areas with existing education interventions. Interventions will be focused in Sindh, Khyber Pakhtunkhwa (KP), Federally Administered Tribal Areas (FATA), Azad Jammu Kashmir (AJK), and Gilgit Baltistan (GB), but will be implemented in any area of Pakistan determined to be able to achieve the greatest impact. PGEEE aims to empower adolescent girls with the human and social capital to engage in and retain greater livelihood opportunities, stronger social, political, and economic opportunities. It recognizes the interdependence among various factors needed to achieve meaningful positive change, particularly in light of its primary target group, girls between ages of 10-19 years, as well as their parents, teachers, and communities. Supporting an enabling policy and local educational environment, project activities will also target results at the individual and community levels, necessary for change and transformation of long-held attitudes and practices, of both males and females, whether adults or adolescents.

1.3 Lessons Learned from Other Activities

The PGEEE PAD includes a number of ongoing activities from which there are some lessons to be derived on environmental compliance. These activities are being implemented through varying implementing mechanisms and these have implications for the approach to and the effectiveness of environmental compliance. For that reason, this IEE includes a table (Table 5) that provides guidelines on the applicable ADS, and 22 CFR 216 and ADS stipulations that apply to these mechanisms. We have found that contractors and Public International Organizations (PIOs) are more effective in complying with the terms and conditions of the Environmental Monitoring and Mitigation Plans (EMMP) than Government of Pakistan (GOP) partners, due to better institutional capacity. One reservation with the PIOs, however, is that although they have the inherent institutional capability, and their own environmental compliance regulations, they do not report regularly to the Mission on compliance activities. This needs to be improved in the future with the Karachi Youth Workforce Development and the Pakistan Safer Schools activities, for example.

Government to Government (G2G) mechanisms tend to be less diligent in complying with the terms and conditions of the EMMPs due to the lower institutional capacity of the Project Management Units (PMU) within government ministries or agencies responsible for activity implementation. The Mission approach to addressing this has been to provide additional training for PMU staff, and third party technical assistance for both training and compliance monitoring. Where the activities involve construction, an additional layer of compliance monitoring is provided by the Mission's Office of Infrastructure and Engineering (OIE) and the Mission Environmental Officer (MEO). OIE has provided invaluable direct support in reviewing engineering drawings and providing oversight monitoring, and indirect support through their engineering (A&E) contractor. One example of this has been with the Sindh Basic Education Program – School Construction Activity.

As PGEEE is planning to implement activities in the security-challenged FATA area, Assistance/Contracting Officers' Representatives (A/CORs) and Activity Managers will be

severely restricted in conducting environmental compliance field visits. In these areas, we will be drawing on the resources of the A&E contractor with requisite capability. In some similar security situations in the past, locally employed staff has been able to conduct field visits. This combination of Mission locally-employed staff, and third party monitoring visits has served us well in these situations.

2. Project Description

The PGEEE Project consists of a compilation of existing activities, and activities that are in the early stages of design or yet to be designed. The PGEEE PAD is, therefore, a planning document for activities aligned with the objectives of the Agency Gender Policy, and the Agency Education Strategy in general, and the LGL Initiative focusing on advancing gender equity and female empowerment through increased education and livelihoods opportunities.

2.1 Existing Activities

USAID/Pakistan identified \$51 million in components under existing activities that can be attributed to LGL (Table 1). These activities were previously approved under existing PADs and have approved IEEs (See Section 7.1.1). The scope and nature of all previously approved activities remain the same. All previously approved Threshold Decisions, conditions, limitations and stipulation for revision remain in force.

A brief description of the LGL-aligned elements of the existing activities, and the amounts attributed to this PAD for a total of \$51 million, are summarized in Table 1 below.

Table 1. LGL-Aligned Existing Activities

| Ongoing Activities | Activity Description | IEE Tracking Number | ETD |
|--|--|--|----------|
| SBEP- Sindh Capacity Development Program | \$537,500 of this \$4 million three-year contract, implemented by Deloitte, oversees an MOU with Intel to provide information communication and technology (ICT) training to out-of-school youth (August 2015 - August 2018). | Original IEE: OAPA-11-APR-PAK-0023 Amdt 1: OAPA-13-JAN-PAK-0006 Amdt 2: OAPA-11-APR-PAK-0023 | CE ND |
| SBEP- G2G School Construction | \$19 million of this \$81 seven-year agreement with the Government of Sindh will construct 18 girls' primary and secondary schools. (October 2014 - September 2018) | | |
| SBEP- Community Mobilization Project | \$707,500 of this five-year \$22.9 million contract with International Relief and Development (IRD) meets LGL objective of reducing barriers to education by conducting community mobilization campaigns to increase girls' enrollment and providing grants to schools for infrastructure upgrades, behavior change communication campaigns about the importance of girls education. The project works towards active participation of girls and their parents in its school and community based activities, including leadership attributes and awareness raising. Gender sessions focus on behavior change and communication which underscores the importance of educating girls and abandoning the cultural practice of favoring boys. (August 2013 - August 2018). | | |

| | | | |
|---|---|---|------------|
| SBEP- Sindh Reading Program | \$255,000 of this five-year \$24.6 million contract with Chemonics will be attributed to the LGL objective of improving education quality. SRP provides in-service teacher training in reading instruction, high-quality learning materials, and provides accelerated learning to out-of-school girls. It provides improved reading instructions for grades 1 and 2 in public schools, and also provides non-formal accelerated basic education for 15,000 out of school children and young adults. (January 2014 - January 2019). | | |
| Pakistan Reading Project | This seven-year \$165 million cooperative agreement implemented by the International Rescue Committee (IRC) addresses LGL objectives of improving educational quality and reducing barriers to education for adolescent girls through in-service and pre-service teachers training in reading instruction, learning materials, scholarships for female teachers to obtain their teaching degrees, and policy engagement to support girls' education. \$14 million will be attributed to LGL. The activity will provide adolescent girls with the reading skills they need for academic success through improved reading instructions and materials, supporting policies, and community mobilization to create a culture of reading. (July 2013 - September 2020). | Original IEE: OAPA-12-JUN-PAK-0030 Amdt 1:OAPA-14-JUL-PAK-0029 Amdt 2: OAPA-14-AUG-PAK-0035 Amdt 3: OAPA-15-FEB-PAK-0012 | CE ND |
| Merit and Needs-Based Scholarship | \$4 million of this \$23.1 million G2G agreement with HEC provides scholarships to talented financially disadvantaged adolescent girls to pursue higher education degrees, aligned with the LGL objective of increasing adolescent girls' empowerment. (October 2014 - September 2020). | Original ANE-06-71; Amdt1 ANE 08-96, Amdt3 Asia 09-123-Pakistan-IEE-ETD, Amdt4 OAPA-13-MAR-PAK-0010 | CE NDC |
| Pakistan Safer School Program | \$800,000 of this four-year \$4.25 million PIO grant to UNICEF supports LGL objectives of improved quality and reduced barriers to education by providing materials and training to teachers on school safety and to provide education to girls from displaced communities. (November 2014 - November 2018). | Original OAPA-12-JUN-PAK-0030 Amdt 1:OAPA-14-JUL-PAK-0029 Amd2 OAPA-14-AUG-PAK-0035 | |
| Karachi Youth Workforce Development | \$127,229 of a two-year grant to the Aman Institute for Vocational Training provides skill building and training for adolescent girls to create income and employment in the garment and home textiles industry in Sindh. (January 2015 - December 2017). | Original IEE: OAPA-14-OCT-PAK-0001 Amdt 1: OAPA-14-AUG-PAK-0036 | CE, NDC |
| Youth Employment Project | \$575,962 of this PIO grant to UNDP provides skill building and training for adolescent girls to create income and employment in the garment and home textiles industry in Sindh. (January 2015-January 2018). | Original IEE: OAPA-14-OCT-PAK-0001 Amdt 1: OAPA-14-AUG-PAK-0036 | CE NDC |
| Training for Pakistan Pathways to success | \$5 million of this five-year \$34 million contract implemented by World Learning meets LGL objective of increasing adolescent girls' empowerment by creating a path to employment for talented, financially disadvantaged adolescent girls through vocational training, scholarships, and internships. (April 2016 - July 2017). | Original: Asia: 10-21 Amdt 1: OAPA-11-Aug-PAK-0038 Amdt 2: OAPA-14-NOV-PAK-0006 | CE |
| Small Grants Ambassador's | \$4 million of this five-year \$34 million contract with the National Rural Support Program will be open for civil society and community-based organizations to initiate | Original IEE: OAPA-11-JUN-PAK-0029 Amdt 1: OAPA-14-DEC-PAK-0011 | CE NDC |

| | | | |
|---|--|--|-----------|
| Fund program | innovative activities in support of adolescent girls. Grants will reduce barriers and improve equitable access to quality education, and build local capacity to improve girls' education and empowerment. | Amdt 2: OAPA-14-MAY-PAK-0020 | |
| Education Relief for Temporary Displaced Children | \$2 million of this two-year \$10 million PIO grant to UNDP supports LGL objective of reduced barriers to education for adolescent girls by rehabilitating damaged schools, providing learning materials, and training for teachers in conflict-affected communities in the Federally Administrated Tribal Areas (FATA). Training will promote gender sensitivity and include psychosocial components (February 2016 - February 2018). | Original OAPA-12-JUN-PAK-0030, Amdt1 OAPA-14-JUL-PAK-0029, AMdt2 OAPA-14-AUG-PAK-0035, Amdt3: OAPA-15-FEB-PAK-0012 | CE NDC |

2.2 New Activities

The Mission has identified another \$99 million in new activities. Of the \$99 million, \$19 million will, in the near term, go towards an LGL-Pakistan activity. In the longer term, during the life of project, another \$80 million will be spent on other similar LGL activities. These activities will have a special focus on increasing workforce development skills and empowering adolescent girls. Illustrative Components include:

- **Policy Implementation Support** – Policy research and technical assistance for stronger, decentralized policy planning, implementation, coordination, management and accountability to promote gender equity in education and the workforce;
- **Social Awareness and Marketing** - Efforts to influence parental, community, and public views on the importance of gender equity in education and the positive role that men and women can play to promote adolescent female development and opportunities;
- **Skills Development** - Formal and non-formal opportunities for adolescent girls and young women to develop workforce and soft skills for employability and entrepreneurship;
- **Linkages to Industry** - Identify willing partners in relevant fields that can link to educational institutions to provide learning/work opportunities; develop partnerships to leverage USAID investment with private sector/industry inputs, contributions or efforts.

Illustrative activities will include:

- Conduct assessment to inform or validate project/activity design.
- Consult with education authorities, civil society, community representatives and private/commercial sector (industry) to coordinate and organize implementation and results.
- Provide technical assistance for research that will inform policy implementation for existing policies on gender equity or girls' education in the education sector.
- Provide technical assistance or otherwise assist Provincial/Area Ministries of Education to include a girls' education/gender equity component in the revised Education Sector Plans.

- Work with participating institutions or organizations to develop or adapt content/curriculum for life and technical skills, including via technological options (e.g. radio, mobile phone).
- Identify organizations and companies that can partner under LGL to elevate, highlight or otherwise contribute to efforts in support of adolescent girls in Pakistan.
- Develop creative, culturally acceptable ways to expose adolescent females to the work environment and/or job opportunities.
- Engage parents and community in supporting education and employment readiness activities.
- Social and media campaigns to increase understanding and acceptance of girls' education and workforce participation.
- Develop and implement enrollment campaigns for adolescent girls out of school.
- Develop and implement a social marketing strategy that increases women professionals' visibility and creates role models - both male and female - that promote adolescent girls' empowerment and potential for the future of Pakistan.
- Following research-based evidence, develop/promote technical areas and/or policies where women can build their capacity and participate in economic activities.
- Train parents, Parent-Teacher Associations (PTA), School Management Committees (SBMC), community-based organizations (CBOs), and other relevant stakeholders in education advocacy, with an emphasis on girls' education or gender equity at local, state, and federal levels.
- Provide grants to local organizations to support activities that contribute to the stated results. Grants will not exceed \$100,000 each, for a total of \$5 million over the life of project and will not include construction activities.
- Attention to girls with disabilities.

2.3 Project Budget

The total value for the PGEEE PAD is \$150 million dollars. This amount includes \$51 million in existing activities being subsumed under the Project. The remaining \$99 million will go to LGL activities of which \$19 million will be procured in the near term, and up to \$80 million in additional activities planned in response to emerging needs in line with LGL objectives. A detailed budget is provided in Table 2 below which shows the attributed funding under existing mechanisms and \$99 million in new activities. The table shows only the amounts being attributed to the PAD for the ongoing activities. These amounts differ from the total life of project (LOP) amounts show in the table of approved IEEs (Table 4) in Section 7.1.1 below.

Table 2: Illustrative Budget

| Ongoing Activities | LOP Attributed to PAD |
|---|-----------------------|
| SBEP- Sindh Capacity Development Program | 0 |
| SBEP- G2G School Construction | \$19,537,500 |
| SBEP- Community Mobilization Project | \$707,500 |
| SBEP- Sindh Reading Program | \$255,000 |
| Pakistan Reading Project | \$14,000,000 |
| Merit and Needs-Based Scholarship | \$4,000,000 |
| Pakistan Safer School Program | \$800,000 |
| Karachi Youth Workforce Development | \$127,229 |
| Youth Employment Project | \$575,962 |
| Training for Pakistan Pathways to success | \$5,000,000 |
| Small Grants Ambassador's Fund program | \$4,000,000 |
| Education Relief for Temporary Displaced Children | \$2,000,000 |
| Sub-total- Attribution ongoing activities | \$51,003,191 |
| New Activities | LOP Attributed to PAD |
| Let Girls Learn (LGL)-Pakistan | \$19,000,000 |
| Other LGL Activities | \$80,000,000 |
| Sub-total-new activities | \$99,000,000 |
| Grand Total | \$150,003,191 |

3. COUNTRY CLIMATE CHANGE INFORMATION (BASELINE INFORMATION)¹

Pakistan has 11 climate zones due to its range of topographies and ecosystems, and each of these experiences different weather and climate patterns. Generally, the coastal areas of the country are dry and hot and the northern uplands get progressively cooler. The winter months (December-February) are cool and dry. The country experiences monsoons from June through September, with a lesser degree of monsoon activity in October and November.

¹ Pakistan Climate Vulnerability Profile available at: <https://www.climatelinks.org/resources/pakistan-climate-vulnerability-profile>

Temperature: Widespread changes in extreme temperatures have been observed in Pakistan over the last 50 years. Cold or frosty days and nights have become less frequent whereas hot days and nights, and heat waves have become more frequent. According to Pakistan's Task Force on Climate Change, temperature is projected to increase from the 1960-1999 baseline by 1.3°C by 2020, 2.5°C by 2050, and 4.4°C by 2080 under one scenario. Under another scenario, temperatures in Pakistan are projected to rise by 1.45°C, 2.75°C and 3.87°C in 2020, 2050, and 2080, respectively.

Precipitation: Average rainfall in the arid and coastal plains of Pakistan has decreased by between 10 and 15 percent since 1960, while increasing during the same time period over northern Pakistan. Heavy rainfall events have increased, with the nine heaviest rains recorded in 24 hours all being registered in 2010.

Sea Level Rise: The low-lying plains along the coast of Pakistan are exposed to the impacts of sea level rise, with conservative scenarios projecting an increase of 40 cm by 2100.

Extreme Events: Pakistan has experienced about 18 extreme weather events since 1990, including the historic 2010 floods, as well as droughts, cyclones, and landslides. Due to the heavy monsoon rains during the summer months, Pakistan often experiences severe flooding in the Indus River basin where much of the population lives on low-lying lands. Rain or otherwise-triggered landslides are common in the northern regions of Pakistan, particularly those connected to Azad Jammu Kashmir province. Lowland plains, especially those surrounding the urban areas of Karachi and Hyderabad, are vulnerable to the impacts of cyclones and storm surge. Finally, sparse and erratic rainfall patterns can alter water tables, leading to drought conditions in the southern and central regions of Pakistan.

4. COUNTRY ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)
Studies conducted by the GOP, USG and donor agencies^{2,3,4, 5,6,7} in Pakistan have highlighted a number of environmental issues. Broadly, the areas of concern identified include uncertainty

² **Pakistan Proposed World Bank Climate Change and Environment Program 2010-2015** World Bank Report No. 69561-PK at: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2012/06/14/000425970_20120614132008/Rendered/PDF/695610ESWOP10500change0ENVJune02010.pdf

³ **Pakistan: Country Development Landscape** World Bank Report No. 91700-PK at: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/10/27/000469252_20141027124747/Rendered/PDF/917000WPOWB0PK00Box385342B00PUBLIC0.pdf

⁴ **Pakistan: Country Snapshot** World Bank Report No. 100119-PK at: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/T_MNA/2015/10/11/090224b083138fb7/1_0/Rendered/PDF/Pakistan000Country0snapshot.pdf

⁵ **Cleaning Pakistan's Air** World Bank Report No. 89065-PK at: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/07/09/000442464_20140709123335/Rendered/PDF/890650PUB0Clea00Box385269B00PUBLIC0.pdf

⁶ **Development of Environmental Laws and Jurisprudence in Pakistan** ADB Report at: <http://www.adb.org/sites/default/files/publication/31140/environmental-law-jurisprudence-pakistan.pdf>

⁷ **Indus Basin Floods** ADB Report at: <http://www.adb.org/sites/default/files/publication/30431/indus-basin-floods.pdf>

and climate variability in the design and operation of water resources projects, potential climate impacts and stress points on the energy sector, water availability for energy and food, climate change impacts on the energy sector, Indus River Basin flood management, energy, pollution, waste management, irrigated agriculture, and biodiversity. Furthermore, accelerated growth and urbanization present additional environmental challenges, such as toxic air and water pollution, and hazardous solid waste. In order to maximize growth, the country needs complementary policies that address environmental issues while facilitating development. Conservative estimates presented in a World Bank report suggest that environmental degradation costs the country at least 6 percent of GDP, and these costs fall disproportionately upon the poor⁸. The increasing pollution of water, air, and land continues to have an enormous impact on people's health: illness and premature mortality caused by air pollution (indoor and outdoor), diarrheal diseases and typhoid due to inadequate water supply, and sanitation and hygiene. These conditions impact largely on vulnerable groups, such as children.

Given its range of latitude and immense variations in altitude, Pakistan spans a number of the world's ecological regions that encompass a variety of habitats supporting rich biodiversity. However, several animal and plant species are currently threatened and/or endangered, largely as a result of overexploitation and loss of natural habitat, exacerbated by pressures stemming from rapid population growth, persistent poverty, and climate change impacts. The country's forest cover has declined steadily, from 2.3% of total land area in 2008 to 2.1% in 2011, due largely to logging, agricultural clearing, and fuelwood harvesting.⁹

Pakistan has gradually established a number of national strategies and policies, relatively comprehensive legal and regulatory frameworks, and specialized institutional structures focusing on environmental protection. The Federal Ministry of Climate Change, established in 2012, is vested with the mandate to comprehensively address disaster management along with spearheading national climate change initiatives both in adaptation and mitigation. It is also responsible for facilitating and harmonizing environmental standards, laws, acts and policies at national level, to develop national strategies and action-plans to fulfill international obligations under various Multilateral Environmental Agreements (Conventions, Protocols, Treaties, etc.).

Pakistan has a commendable record of efforts to promote conservation and longer term sustainability, from the National Conservation Strategy of 1992 through to the adoption of a National Environment Policy (NEP) in 2005.

⁸ **Pakistan Proposed World Bank Climate Change and Environment Program 2010-2015** World Bank Report No. 69561-PK at: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2012/06/14/000425970_20120614132008/Rendered/PDF/695610ESWOP10500change0ENVJune02010.pdf

⁹ **Country Partnership Strategy: Pakistan, 2015–2019** ADB Report at: <http://www.adb.org/sites/default/files/linked-documents/cps-pak-2015-2019-ena.pdf>

5. LEGISLATIVE AND REGULATORY FRAMEWORK:

5.1 National Environmental Policies and Legislation¹⁰

5.1.1 Pakistan Environmental Protection Act 1997¹¹

The Pakistan Environmental Protection Act (PEPA), 1997 is the basic legislative tool empowering the GOP to frame regulations for the protection of the environment.

5.1.2 Pakistan IEE/Environmental Impact Assessment (EIA) Regulation, 2000^{12 13}

The PEPA review of the 2000 IEE and EIA regulations (the regulations) provides the necessary details on the preparation, submission and review of IEE and the EIA reports. The regulation classifies projects on the basis of their expected degree of adverse environmental impacts and lists them in two separate schedules.

5.1.3 National Environmental Quality Standards (NEQS) 2000¹⁴

First promulgated in 1993, the NEQS were last amended in 2000. They constitute the basic guidelines with which liquid effluent and gaseous emissions of municipal and industrial origin must comply. These standards present the maximum allowable concentration for liquid effluent before its discharge into the sea, inland water and sewage (total 32 parameters with which to comply) and gaseous emissions in the ambient air from industrial sources (total 16 parameters with which to comply).

5.1.4 Occupational Health and Safety (OHS) Standards

The main law governing OHS in Pakistan is the Factories Act of 1934. The Hazardous Occupation Rules of 1978 designate certain occupations as hazardous and contain special provisions to regulate working conditions in these occupations. Additionally, other laws dealing with OHS include: The Mines Act (1923), Social Security Ordinance (1965), Workmen's Compensation Act (1923), Shop and Establishment Ordinance (1969), and the Dock Laborer Act (1934). Additionally, the Hazardous Substances Rules (2003) cover worker safety and the use of hazardous substances in the workplace.

5.1.5 Building Codes / Seismic Standards

Pakistan is one of the most seismically active countries in the world. Following the devastating October 2005 earthquake, on August 26, 2007, the new Pakistan Building Code went into effect throughout the country¹⁵. All structures, new buildings, including residential, industrial, and commercial, particularly high-rise buildings, are required to follow the requirements of the Code, in particular with regard to its seismic provisions.

¹⁰ <http://www.environment.gov.pk/> and <http://www.lexadin.nl/wlg/legis/nofr/oeur/lxwepak.htm>

¹¹ <http://www.environment.gov.pk/act-rules/Brief-PEPA-Act1997.pdf>

¹² <http://www.environment.gov.pk/act-rules/IEE-EIA-REG.pdf>

¹³ <http://environment.gov.pk/> with links to provincial offices with environment responsibilities

¹⁴ <http://www.environment.gov.pk/NEQS/SRO549%20I2000-NEQS.pdf> covers liquid industrial effluents

¹⁵ The new building code replaced the 1986 Pakistan Building Code, which was never formally adopted by as a government regulation.

5.1.6 Local Government Ordinance, 2001

This Act empowers the GOP and provincial governments to enforce laws for land use, conservation of natural vegetation, air, water, and land pollution, disposal of solid waste and wastewater effluent, and public health and safety, including some provisions for environmental protection. Section 93 of this Ordinance pertains to environmental pollution under which the local councils are authorized to restrict activities causing pollution to air, water, or land.

5.2 Provincial Environmental Policies and Legislation

5.2.1 Punjab Province

5.2.1.1 Punjab Environmental Protection Act, 2012

The Punjab Environmental Protection Act, 1997 (amended 2012) is the basic legislative tool at the provincial level after the devolution of power in the 18th amendment to the Pakistan Constitution, empowering provincial governments to frame regulations for the protection of the environment. The act is similar in nature to the Pakistan Environmental Protection Act and refers to the Pakistan Environmental Protection Agency Review of IEE and EIA regulations as the primary guideline for preparation of environmental safeguards instruments. The regulatory powers and implementation responsibilities are now designated in the province to the Punjab Environmental Protection Department (EPD). Punjab EPD is also required to ensure compliance with the National Environmental Quality Standards (NEQS) and establish monitoring and evaluation systems.

5.2.1.2 Punjab Wildlife (Protection, Preservation, Conservation and Management) Act, 1974

This law was enacted to protect the province's wildlife resources directly and other natural resources indirectly. It classifies wildlife by degree of protection, i.e., animals that may be hunted on a permit or special license, and species that are protected and cannot be hunted under any circumstances. The Act specifies restrictions on hunting and trade in animals, trophies, or meat. The Act also defines various categories of wildlife protected areas, i.e., National Parks, Wildlife Sanctuaries, and Game Reserves.

5.2.2 Sindh Province

5.2.2.1 The Sindh Environmental Protection Act 2014

After passage of the 18th Amendment to the Pakistan Constitution, the Sindh Government enacted its own environmental law. The Sindh Environmental Protection Bill, 2014 was signed by the Governor of Sindh on March 19, 2014 as an Act of Legislature of Sindh.

5.2.2.2 Sindh Wildlife Protection Ordinance, 1972 and Amendments 2001

This ordinance provides for the preservation, protection, and conservation of wildlife by the formation and management of protected areas and prohibition of hunting of wildlife species declared protected under the ordinance. The ordinance also specifies three broad classifications of the protected areas: national parks, wildlife sanctuaries, and game reserves.

5.2.3 Khyber Pakhtunkhwa Province (KPK)

5.2.3.1 The KPK Environmental Protection Act, 2014

After enactment of the 18th amendment to the Pakistan Constitution, Khyber Pakhtunkhwa Provincial Government enacted its own environmental law. The Khyber Pakhtunkhwa Environmental Protection Bill, 2014 was signed by the Governor of Khyber Pakhtunkhwa on 4th December, 2014 as an Act of Legislature of Khyber Pakhtunkhwa.

5.2.3.2 KPK Wildlife and Biodiversity (Protection, Preservation, Conservation and Management) (Amendment) Act, 2015

KPK Wildlife and Biodiversity (Protection, Preservation, Conservation and Management) Act, 2015 provides legislation for wildlife and biodiversity protection in the KPK province. The Act makes provision for the declaration of Wildlife Sanctuaries and Game Reserves, and for the restriction of hunting in protected areas.

5.2.4 Balochistan Province

5.2.4.1 Balochistan Environmental Protection Act, 2012

Balochistan Environmental Protection Act of 2012 provides the overarching provincial framework for the protection of the environment in Balochistan. It builds on the provisions of PEPA and localizes them to the provincial context.

5.2.4.2 Balochistan Environmental Protection Agency

Balochistan Environmental Protection Agency (BEPA) is a department headed by the Secretary of Environment and Sports. It is the sole environmental regulatory body for Balochistan Province, responsible for implementing National and provincial laws, improving the protection of environmental and natural resources of the Province, while developing policies for improvement and sustainable use of natural resources.

5.2.4.3 EIA Approval Procedure in Balochistan

The Balochistan Act has further devolved the power at district/regional level and allows for district agencies along with a provincial EPA (Para 8 of the Act). The BEPA is vested with the authority of reviewing IEE/EIAs in line with the institutional administrative structure.

5.2.4.4 Balochistan Wildlife Protection, Preservation, Conservation and Management Act, 2014

This legislation is guided primarily by the principle of ensuring the protection, preservation, promotion, conservation, management and sustainable development of wild animals in recognition of their position as key components of biological diversity with social, cultural, economic and ecological significance for the present and future generations.

5.2.4.5 Balochistan Culture Heritage Preservation Act, 2010

This Act empowers the Provincial Government to protect cultural heritage in the province. It empowers the government to compulsorily acquire any heritage that could be lost to various threats. It states punitive action for the wilful destruction of protected cultural heritage.

5.2.5 Gilgit Baltistan Region

5.2.5.1 Gilgit Baltistan Environmental Protection Agency

Gilgit-Baltistan Environmental Protection Agency (GB-EPA) was established under section (8) of PEPA, 1997. The GB-EPA may undertake inquiries or investigation into environmental issues, either of its own accord or upon complaint from any person or organization. GB-EPA also provides the framework for implementation of a National Environmental Policy and National Sanitation Policy; establishment of Provincial Sustainable Development Funds; protection and conservation of species; conservation of renewable resources; establishment of Environmental Tribunals; and appointment of Environmental Magistrates.

5.2.6 Azad Jammu & Kashmir (AJK)

5.2.6.1 AJK Environmental Protection Act, 2000

An Environmental Unit (EU) was established in Planning & Development Department of AJK in 1994 to carry out the environmental assessments of public sector initiatives. The EU was later upgraded to AJK Environmental Protection Agency (EPA) in 1997 under AJK Environmental Protection Act of 1996. The AJK Environmental Protection Act of 1996 was further amended and enacted as AJK Environmental Protection Act in 2000, empowering the regulatory body to formulate policies, develop interdepartmental coordination and establish NEQS with the Council's approval.

5.2.6.2 The Jammu and Kashmir Forest Regulations, 1930

The main legislation for management and protection of forest and rangeland in AJK is the Jammu and Kashmir Forest Regulation of 1930 and its later amendments of 1973, 1976, 1977 and 1980. The amendments are mostly related to penal provisions for forest offences. According to the AJK Forest Regulations, the forests are designated as 'Demarcated' or 'Un-demarcated'. The former, are under the control of Forest Department, while the latter are under the control of the Board of Revenue through the Deputy Commissioner. There are two other categories of forests in AJK denominated as "Village Forests" and "Private Forests". The former are established under Section 14 (a) of the AJK Forest Regulations, while the latter are established under the Private Forest Rules of AJK Land Revenue Act 1955. Moreover, the "Tree Plantation & Maintenance Act 1977 has been enacted to ensure planting and maintenance of at least 3 trees per acre in farmland. Under the provision of the forest related legislations there are regulations on usufruct right of the communities or individuals for using the area for grazing, acquiring wood for fuel wood or timber. However, for cutting trees for the construction of a project, special permission would be needed from the Forest Department and Revenue Department/Local Administration depending upon the type of forest encountered.

5.2.6.3 The AJK Wildlife (Protection, Preservation, Conservation and Management) Act, 1975

In addition to empowering AJK wildlife department to establish game reserves, parks, and wildlife sanctuaries, this Act regulates the hunting and disturbance of wildlife. Where proposed projects may have an impact on wildlife, the AJK-EPA requires the proponent to coordinate with the AJK wildlife department for the implementation of the project, and monitor activities during construction and operation of the project.

5.3 International Environmental Treaties Ratified by Pakistan

Pakistan is a signatory to a number of international environmental agreements and International Labor Organization (ILO) conventions. These Multilateral Environment Agreements (MEAs) impose requirements and restrictions of varying degrees upon the member countries in order to meet the objectives of the agreements. However, the implementation mechanism for most of these MEAs is weak in Pakistan, and the institutional framework needs strengthening. The following are the relevant international treaties and conventions that have been ratified by Pakistan:

1. Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Pakistan Ratified: 1976
2. Ramsar Convention on Wetlands. Pakistan Ratified: 1976
3. Convention on the Conservation of Migratory Species of Wild Animals (CMS). Pakistan Ratified: 1987
4. Vienna Convention on protection of ozone layer; and Montreal Protocol on ozone layer depleting substances. Pakistan Ratified: 1992
5. UN Convention on Biological Diversity (UNCBD). Pakistan Ratified: 1994.
6. Nagoya Protocol on Access and Benefit Sharing (ABS) under the convention on Biological Diversity (UNCBD).
7. UN Convention to Combat Desertification (UNCCD). Pakistan Ratified: 1997
8. Kyoto Protocol to United Nation Framework Convention on Climate Change (UNFCCC). Pakistan Ratified: 2005
9. Rotterdam Convention on the Prior Informed Consent (PIC) Procedure for Certain Hazardous Chemicals and Pesticides in International Trade. Pakistan Ratified: 2005
10. Stockholm Convention on Persistent Organic Pollutants (POPs). Pakistan Ratified: 2008
11. Cartagena Protocol on Bio-Safety (CPB). Pakistan Ratified: 2009
12. United Nations Framework Convention on Climate Change, Paris Agreement – signed April 22, 2016
13. International Treaty on Plant Genetic Resources for Food and Agriculture -2001 Pakistan Accession - 02 September 2003
14. International Plant Protection Convention – 1952. Pakistan Ratified - 10 November 1954
15. Plant protection Agreement for the Asia and the Pacific Region – 1956. Pakistan Adherence - 08 January 1958
16. Declaration on Control and Prevention of Air Pollution and its Likely Trans-boundary Effects for South Asia. Pakistan Endorsed - April 1998
17. The World Organization for Animal Health (OIE) - international Agreement signed on January 25th 1924 for Animal Health.
18. WTO's Agriculture Agreement - Agreement on Sanitary and Phytosanitary Measures
 - a. Uruguay Round Agreements
 - b. Doha Round Agreements

5.4 USAID Climate Risk Screening Requirements

Presidential Executive Order 13677, dated September 23, 2014, "Climate-Resilient International Development" <http://www.whitehouse.gov/the-press-office/2014/09/23/executive-order-climate-resilient-international-development>, requires agencies engaged in international development to assess and evaluate climate-related risks and vulnerabilities and to adjust strategies, planning,

programs, projects, investments, and overseas facilities, as appropriate, based on those assessments and evaluations. Emanating from this, USAID Agency Notice, Issuance of New ADS Mandatory Reference on Climate Change in USAID Strategies, dated October 9, 2015, notified the requirement for climate risk screening of all new USAID strategies, effective October 1, 2015, and for all new projects and activities, effective October 1, 2016. The requirement for climate risk screening at the strategy level is now formalized in the revised ADS 201, dated 9/7/2016. The Mandatory Reference for ADS Chapter 201, Climate Risk Management for USAID Projects and Activities, dated October 12, 2016, mandates climate risk assessments at the project and activity levels, outlines the process and provides tools for so doing.

Climate risk screening was conducted for the LGL activities only. A climate risk management analysis is not required for the activities being subsumed under the PAD.

5.5 USAID Environmental Compliance Requirements

United States Government laws require that all activities financed by USAID shall comply with the requirements of U.S. law 22 CFR 216 and stipulations in relevant ADS. Ensuring that USAID projects do not result in significant environmental and social impacts is guided by several actions, including arriving at a threshold decision in an IEE, developing monitoring and mitigation procedures, and including environmental compliance requirements in contracts, grants, cooperative agreements, and other project authorization documents (such as Activity Agreements for Government to Government projects). All environmental compliance requirements of U.S. law 22 CFR 216 as explained in this IEE shall be included and reflected in all sub-contracts, sub-grants, and sub-agreements under the Project.

To promote pesticide safety, USAID environmental regulations require the preparation of a Pesticide Evaluation Report and Safe Use Action Plan (PERSUAP) for any pesticide or chemical that is used as a pesticide. USAID prepared a program level PERSUAP for its activities in Pakistan. Certain waste materials may contain chemicals that are regulated by the PERSUAP. This project does not currently involve use of pesticide. In case a need arise for pesticide use or recommendation, the project will follow the BEO/OAPA-approved "2014 Pakistan Programmatic PERSUAP (2014 PPERSUAP), as amended, provided at: <http://gemini.info.usaid.gov/egat/envcomp/repository/pdf/40676.pdf>

6. PROJECT ACTIVITIES AND RECOMMENDED CLIMATE RISK MANAGEMENT ACTIONS (INCLUDING MONITORING AND EVALUATION):

The Project design team used “USAID’s Climate Risk Screening Tool” (Mandatory Reference for ADS Chapter 201, dated 10/12/16) to assess the potential climate risks for the project. The tool is essentially a matrix that systematically identifies the relevant sectors, regions, and timeframes for analysis, and assesses the potential climate change impacts, adaptive capacity and potential options to address those impacts.

Project activities will be focused in Sindh, Khyber Pakhtunkhwa (KP), Federally Administered Tribal Areas (FATA), Azad Jammu Kashmir (AJK), and Gilgit Baltistan (GB), but will be implemented in any area of Pakistan determined to be able to achieve the greatest impact.

This climate risk screening focuses only on the LGL-Pakistan activity which will be implemented within the same geographical scope as the remainder of the Project. It considered the potential impacts of: climate (temperature, drought, precipitation and flooding, sea level rise and storm surge, and winds and other storms), across the geographical scope, over a ten-year time frame in the four activity components, policy implementation and support, social awareness and marketing, skills development, and linkages to industry. The timeframe was limited to ten years as the activity is only providing technical assistance and training over five years with perhaps another five-year sphere of influence. There is no investment in construction or other infrastructure.

Specific questions related to climate risk for the “Education, and Social and Economic Services and Protection for Vulnerable Populations” sector, per Agency Climate Change Risk Screening Tool – Facilitator’s Note, updated June 2016, were raised with regard to the activity components. Questions pertaining to the opportunities for creating awareness and preparing for adaptation were particularly germane.

The climate risk screening concluded that there were no potential climate impacts on the activity and the rating for all activity components is low. Specific follow-up actions to mitigate risks during the life of activity are, therefore, not required. The analysis did reveal, however, that the activity offers several opportunities for raising climate change awareness in communities, and adapting skills training curricula to include skills relevant to climate change adaptation. As the activity includes a policy implementation support component, it affords the opportunity to work with local officials to develop evidence-based policies to address climate change impacts, put financial resources in place, and improve the institutional framework for climate risk screening, adaptation planning, and implementation of rehabilitation activities.

The LGL-Pakistan activity does not anticipate any construction activities. Should construction later be considered for this or any of the yet unidentified activities, climate risk screening shall be conducted at the activity level in conjunction with the IEE for review and approval by A/COR, MEO and Climate Integration Lead (CIL), along with related documents, like the EDF/EMMP.

A summary of the conclusions from the analysis is presented in Table 3 below.

Table 3: LGL-Pakistan Climate Risk Screening Summary

| Illustrative Interventions | Risks | Risk Rating | How Risks Addressed /Accepted | Opportunities to Strengthen Climate Resilience |
|-----------------------------------|--------------|--------------------|--------------------------------------|---|
| Policy Implementation Support | None | Low | Not Applicable | Opportunity to work with local officials to develop evidence-based policies to address climate change impacts, put financial resources in place, and improve the institutional framework for climate risk assessment, adaptation planning, and implementation of rehabilitation activities. |
| Social Awareness and Marketing | None | Low | Not Applicable | Opportunity to increase the awareness of students, parents, and community organizations on the impacts of climate change, and develop coping mechanisms. |
| Skills Development | None | Low | Not Applicable | Opportunity to prepare local artisans with new skills that are related to climate change impacts. This could include, for example, engineering solutions to mitigate climate risks, and new irrigation techniques to minimize water use. |
| Linkages to Industry | None | Low | Not Applicable | Opportunity for industry to be made aware of climate change impacts related to the particular sector and to develop adaptation plans in collaboration with education sector development planners. |

7. PROJECT ACTIVITIES AND RECOMMENDED THRESHOLD DECISIONS & MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATIONS)

This IEE satisfies the conditions of the environmental procedures for project activities and delegation of environmental review responsibility to Missions.

The following determinations are recommended:

7.1 RECOMMENDED THRESHOLD DECISIONS

7.1.1 Existing Activities

The existing activities that are being subsumed under the PAD have BEO-OAPA approved IEEs. A list of these activities with their approved IEEs, threshold determinations, and LOP funding is presented in Table-4. *The life of project value for the sum of these activities is not to exceed \$51 million (34% of LOP amount).*

Table 4: IEE Approvals for Existing Activities

| Ongoing Activities | IEE Tracking # | Determination | LOP Amount | LOP Start date | LOP End Date | LOP Attributed to PAD |
|---|--|---------------|---------------|----------------|--------------|-----------------------|
| SBEP- Sindh Capacity Development Program | Original IEE: OAPA-11-APR-PAK-0023 | CE, ND | \$4,900,000 | 2012 | 2018 | 0 |
| SBEP- G2G School Construction | Amdt 1: OAPA-13-JAN-PAK-0006 | CE, ND | \$81,000,000 | 2012 | 2018 | \$19,537,500 |
| SBEP- Community Mobilization Project | Amdt 2: OAPA-11-APR-PAK-0023 | CE, ND | \$22,901,589 | 2012 | 2018 | \$707,500 |
| SBEP- Sindh Reading Program | | CE, ND | \$24,615,080 | 2012 | 2018 | \$255,000 |
| Pakistan Reading Project | Original IEE: OAPA-12-JUN-PAK-0030 Amdt 1: OAPA-14-JUL-PAK-0029 Amdt 2: OAPA-14-AUG-PAK-0035 Amdt 3: OAPA-15-FEB-PAK-0012 | CE, ND | \$165,000,000 | 2013 | 2020 | \$14,000,000 |
| Merit and Needs-Based Scholarship | | | | 2014 | 2020 | \$4,000,000 |
| Pakistan Safer School Program | Amdt 1: OAPA-14-JUL-PAK-0029 | CE, NDC | \$4,611,822 | 2014 | 2018 | \$800,000 |
| Karachi Youth Workforce Development | Original IEE: OAPA-14-OCT-PAK-0001 Amdt 1: OAPA-14-AUG-PAK-0036 | CE, NDC | \$85,700,000 | 2015 | 2017 | \$127,229 |
| Youth Employment Project | Original IEE: OAPA-14-OCT-PAK-0001 Amdt 1: OAPA-14-AUG-PAK-0036 | CE, NDC | \$85,700,000 | 2015 | 2018 | \$575,962 |
| Training for Pakistan Pathways to success | Original: Asia: 10-21 Amdt 1: OAPA-11-Aug-PAK-0038 Amdt 2: OAPA-14-NOV-PAK-0006 | CE | \$360,000,000 | 2016 | 2017 | \$5,000,000 |
| Small Grants Ambassador's Fund program | Original IEE: OAPA-11-JUN-PAK-0029 Amdt 1: OAPA-14-DEC-PAK-0011 Amdt 2: OAPA-14-MAY-PAK-0020 | NDC | \$50,000,000 | 2014 | 2017 | \$4,000,000 |
| Education Relief for Temporary Displaced Children | Amdt3: OAPA-15-FEB-PAK-0012 | NDC | \$10,250,000 | 2016 | 2018 | \$2,000,000 |
| Sub-total- Attribution ongoing activities | | | | | | \$51,003,191 |

7.1.2 New Activities

7.1.2.1 LGL

Categorical Exclusion per 22 CFR 216.2(c)(2)(i), (\$67.7 million, 45%)

It is recommended for technical assistance, in-kind and monetary grant activities associated with PGEEE implementation, and the implementation of proposed actions that do not have an effect on the natural or physical environment. *The life of project value for the sum of these activities is not to exceed \$67.7 million (45% of LOP amount).* Such activities may include the following:

- Program management and other such administrative activities;

- Technical assistance, capacity building or training activities [22CFR216.2(c)(2)(i)]
- Public awareness/communication/outreach campaigns, media campaigns, advocacy/information campaigns and Public information campaigns
- Information and experience sharing sessions [22CFR216.2(c)(2)(iii)]
- Studies required to support activities of the program [22CFR216.2(c)(2)(iii)]
- Analyses, investigations, reviews, assessments, restructuring and business plans, planning, studies (feasibility, monitoring, impact evaluation, and other social/technical/engineering studies, etc.), surveys, mapping, workshops, seminars, conferences, meetings, enterprise resource planning, consultations, GIS mapping, policy and governance assistance [22CFR216.2(c)(2)(iii)];
- Preparation of environmental documentation including environmentally required studies. [22CFR216.2(c)(2)(iii)]
- Activities which have no potential environmental impacts, including those activities not requiring a BEO-OAPA approved EA according to USAID procedures or EIA according to Pakistan Environment Laws. The USAID environmental procedures are governing in this case.

Negative Determination with Conditions (NDC) per CFR 216.3(a) (2)(iii), (\$31.3 million, 21%)

A Negative Determination with Conditions is recommended for all other activities undertaken in the project that are not listed above for which a Categorical Exclusion is recommended. The activities qualifying for a Negative Determination with Conditions are further defined in Section 7.5, Summary Threshold Determinations, Table 6, in this IEE. These activities may have potentially minor to moderate adverse impacts on the physical and natural environment. *The life of project value for the sum of these activities is not to exceed \$31.3 million (21% of LOP amount).* These activities are recommended for **Negative Determination with Conditions** per 22 CFR 216.3(a)((2)(iii), the **Threshold Decision Conditions** being:

- a) In accordance with Agency policy and USAID/Pakistan Mission Order, 200.8, on Construction Oversight Procedures, dated 12/10/2013, adequate USAID engineering oversight must be applied to ensure that environmentally sound design, specifications, materials, monitoring and evaluation (M&E), and best management practices (BMPs) to:
 - Minimize impact on the environment during the design, implementation, and life of operation of the activities.
 - Minimize erosion, debris and waste production, and proper disposal of debris and waste.
- b) The Implementer is required to comply with Executive Order 13677, dated September 23, 2014, "Climate-Resilient International Development" <http://www.whitehouse.gov/the-press-office/2014/09/23/executive-order-climate-resilient-international-development> requiring agencies engaged in international development to assess and evaluate climate-related risks and vulnerabilities and to adjust strategies, planning, programs, projects, investments, and overseas facilities, as appropriate, based on those assessments and evaluations.

- c) The Implementer is encouraged to implement White House Memorandum dated October 7, 2015, "Incorporating Ecosystem Services in Federal Decision Making" to protect and enhance the economic and social benefits provided to communities by ecosystems and natural habitats.
 (<https://www.whitehouse.gov/sites/default/files/omb/memoranda/2016/m-16-01.pdf>).

7.2 Mitigation, Monitoring and Evaluation

Project activities will have differing Mitigation, Monitoring and Evaluation requirements.

1. **Categorical Exclusion:** These activities will have no effect on the environment and require no Mitigation, Monitoring and Evaluation.

2. **Negative Determination with Conditions (NDC):** Such facilities can have minor or moderate, adverse effect on the environment and require Mitigation, Monitoring and Evaluation measures. An Environmental Declaration Form (EDF) is required for each activity so classified. In preparing the EDFs, the implementer will identify potential adverse environmental risks and impacts, and will identify mitigation measures. All activities that warrant a **Negative Determination with Conditions** or a **Positive Determination** must meet the following conditions:

- A *site and route-specific* EDF and Environmental Mitigation and Monitoring Plan (EMMP) identifying potential adverse environmental risks and impacts, mitigation measures, monitoring and inspection schedule, and entities required to insure compliance with the EMMP must be developed and approved by the A/COR and MEO/DMEO prior to commencement of a NDC activity. Monitoring and mitigation activities must be incorporated into Annual Work Plans and Performance Monitoring Plans. Templates for the EDF and EMMP are attached (Attachments 1 and 2, respectively) to this IEE. Previously-developed environmental manuals may be adapted to the scope of work of activities, as appropriate.
- If the completed EDF indicates the potential for significant adverse environmental and social impacts, an Environmental Assessment (EA) process will be launched in consultation with the MEO/DMEO and with the concurrence of the Regional Environmental Advisor-OAPA (REA-OAPA). The process will follow the requirements of 22 CFR 216.6 and will involve: 1) developing a scope of work for Scoping to be reviewed and approved by the BEO/OAPA; 2) scoping shall involve public consultation with potentially affected people and key relevant stakeholders, 3) Scoping Statement shall be reviewed and approved by the BEO/OAPA, 4) draft EA report shall be subject to: public consultation with potentially affected people and key relevant stakeholders, and review and approval by duly national and/or provincial environmental authority, 5) EA report shall be reviewed and approved by the BEO/OAPA; 6) findings and recommendations of the EA report with an EMMP shall be presented in an amendment to this IEE, duly reviewed and approved in the Mission and by the BEO/OAPA.
- The activity grant manual must include a separate annex on Environmental Compliance Requirements that outlines the procedures for screening of activities with the requisite

EDF/EMMP templates attached. This annex may be adapted from previously approved environmental compliance guidelines approved in the Mission.

- Quarterly Reports will include a section entitled Environmental Compliance that provides details on indicators, mitigation efficacy, and unintended environmental consequences of activities.

The following additional references may help in the preparation of Environmental Manual (EM), EDFs and their Environmental Mitigation and Monitoring Plans (EMMPs).

- Environmentally Sound Design (ESD) Sector Environmental Guidelines, Small-Scale Energy, USAID. Discusses potential environmental impacts, mitigation measures, and monitoring measures for renewable energy projects using solar, wind, hydro, bioenergy (biogas and solid biomass), and geothermal resources.
<http://www.usaidgems.org/sectorGuidelines.htm>
- Guidance Manual for Developing Best Management Practices, USEPA – Best management practices (BMPs) are recognized as an important part of controlling releases of pollutants to receiving waters and reduce costs as well as pollution risks through source reduction and recycling/reuse techniques.
<http://www.epa.gov/npdes/pubs/owm0274.pdf>
- International Finance Corporation (IFC) Environmental, Health and Safety Guideline –
<http://www.ifc.org/wps/wcm/connect/554e8d80488658e4b76af76a6515bb18/Final%2B-%2BGeneral%2BEHS%2BGuidelines.pdf?MOD=AJPERES>
- European Bank for Reconstruction and Development (ERBD) Sub-Sectoral Environmental and Social Guidelines at:
<http://www.ebrd.com/about/policies/enviro/sectoral/>
- <http://www.epa.gov/oecaagct/ag101/printdairy.html>
- <http://www.aphis.usda.gov/wps/portal/aphis/home>

The implementer will use environmentally sound designs, specifications, and materials; monitor and evaluate environmental impacts during implementation; follow environmental impact mitigation measures detailed in the EMMP; use international best management practices (BMPs) acceptable to USAID; and submit to USAID reporting as detailed in the site specific EMMP. All applicable GOP environmental requirements will be satisfied prior to commencement of work, during implementation, and as required post-commissioning.

7.3 Additional Conditions

7.3.1 Conditions Pertaining to Various Implementing Mechanisms

As the Project will be using a number of different implementing mechanisms, the following table (Table 5) provides guidelines on the application of U.S. Government environmental compliance regulations, policies and procedures for these mechanisms.

Table 5: Guidelines on Applicable U.S. Government Environmental Compliance Policies and Regulations for Various Implementing Mechanisms

| Implementing Mechanism | Requirements | USAID References |
|---|--|--|
| Institutional contracts, cooperative agreements, grants | <p>Title 22 of the Code of Federal Regulations, Part 216 codifies USAID's environmental procedures (cited as 22 CFR 216) to ensure that environmental factors and values are integrated into the A.I.D. decision making process.</p> <p>ADS 204 provides policy directives and required procedures on how to apply Title 22 of the Code of Federal Regulations, Part 216 (22 CFR 216) to the USAID assistance process.</p> <p>ADS 201.3.4.5the Initial Environmental Examination (IEE) may be completed for all activities in a PAD, while in other cases the IEE determination may be deferred to the activity design process. The Mission or Washington OU must determine the appropriate timing for completing the IEE. In all cases, the Mission or Washington OU should consult closely with their MEO or BEO and must complete a threshold determination prior to award and prior to the implementation of the activity.</p> | ADS 204, 22 CFR 216, ADS 201 |
| Interagency Agreements | <p>Per ADS 306.3.7.9.a, while the Recipient Agency must comply with all applicable law, such compliance would not necessarily include USAID's own, sometimes broad, implementation of statutes as reflected in its internal policies.</p> <p>Per ADS 306.3.7.9.a, in cases involving a sensitive USAID policy, USAID may, if its wishes, review the Recipient Agency's description of the proposed activity to satisfy itself that the policy in question will not be violated.</p> <p>Per ADS 306.3.7.9.a, this type of policy review is not required, however, and such a policy review does not impose the USAID policy on the Recipient Agency or diminish the Recipient Agency's responsibility to comply with all applicable law.</p> <p>Per ADS 306.3.2.14 regarding FAA 632(a) agreements, and ADS 306.3.7.9.b, regarding FAA 632(b) agreements, the Recipient Agency is permitted to use its own procurement and administrative procedures in administering the transferred or allocated funds, but it may not be prudent for USAID to proceed with a transfer or allocation when USAID is on actual notice that the Recipient Agency's procedures are inadequate for the proposed activity</p> | ADS 306.3.7.9.a; ADS 306.3.7.9.b; 22 CFR 216 |
| Government to Government | Activities must be implemented in accordance with the requirements of ADS 220, and in compliance with 22 CFR 216 and ADS 204. | 22 CFR 216, ADS 220, ADS 204 |
| PIO Grants - Program Contribution | Per ADS 308.3.11(c), Program Contribution-type PIO grants not for the purpose of carrying out a specifically identifiable project or projects, as well as all general contributions, will normally be categorically excluded from environmental analysis under 22 CFR 216.2(c)(2)(vi). | ADS 308, 308.3.11(c), 22 CFR 216.2(c)(2)(vi) |
| PIO Grants -- Cost-Type Grants | Per ADS 308.3.11(c), in awarding Cost-type PIO grants to PIOs with their own environmental policies, for activities that are not exempt or categorically excluded from environmental analysis under 22 CFR 216, USAID should strive to rely upon the PIO's application of its own environmental policies to the activity proposed and include appropriate language in the PIO agreement. | ADS 308.3.11(c), 22 CFR 216 |
| GDA | <p>USAID must make a due diligence investigation of the environmental record and practices of each partner in an alliance, and for the alliance as a whole.</p> <p>Where USAID resources are utilized under such structures (pooled resources), programs and activities are subject to environmental review under 22 CFR 216. The level of review depends on the proposed program or activity.</p> <p>To the extent that an alliance involves programs and activities that are not funded by USAID, 22 CFR 216 would not apply to activities financed separately by alliance partners utilizing their own funding mechanisms.</p> | 22 CFR 216, ADS 204.3.9 |

| | | |
|--|---|--|
| | For purposes of this discussion, due diligence means that, while the 22 CFR 216 environmental review procedures may not be applicable to a non-USAID funded parallel program or activity implemented under an alliance, USAID is still concerned about a proposed alliance partner's past record of environmental accountability and how it might affect the partner's specific plans under the alliance. | |
|--|---|--|

7.3.2 USAID A/COR and Project Manager Responsibility

The A/COR shall ensure that:

- a) All conditions, limitations, and stipulation for revisions are fully transposed into relevant procurement instruments, and A/COR together with the MEO shall explain these to the contractor(s) at the "post award" conference
- b) During implementation of activities, all requirements defined in EDFs, and in their attached EMMPs, will be complied with. Compliance reporting is complete and submitted to the A/COR for review according to the agreed schedule.
- c) All activity work plans include the required compliance/mitigation measures, including the appropriate IEE, EDF, and EMMP references, and progress reports must discuss status and progress in mitigation and compliance actions.
- d) All engineering/construction designs, guidance, and specifications are submitted to the USAID Office of Infrastructure and Engineering for review and approval that they meet applicable environmental, OHS, and construction standards. No work shall commence prior to receipt of such approval(s).
- e) All EDF/EMMPs and climate risk screening are reviewed and approved by the A/COR, MEO/DMEO and the CIL, and maintained in official project files.
- f) No "Negative Determination with Conditions (NDC)" activities shall be conducted prior to receiving approval of the EDF/EMMP from the A/COR and MEO.
- g) All environmental compliance requirements of U.S. law 22 CFR 216 and all environmental conditions established in this IEE, shall be duly transposed in the Request for Proposal/Assistance (RFP/A), Contract, and all sub-contracts.
- h) A/COR monitors the implementer's processes and required reporting of inspections as per the EMMP to ensure compliance with 22 CFR 216 requirements throughout the life of the Contract/Agreement.

7.3.3 Implementing Partner Responsibility

The Implementer shall ensure that:

- a) All activities will be implemented in accordance with Pakistani environmental, Occupational Health and Safety (OHS), and construction regulations, standards, norms and guidelines, and national obligations under ratified international environmental agreements (see: <http://www.environment.gov.pk>), conditions established in the approved EAs done for each project and in their absence in accordance with the best international practice appropriate to the seismicity and flood conditions in Pakistan, and in respective districts. These should be acceptable to USAID.

- b) The Implementer shall include environment compliance considerations in all aspects of project implementation and will promote and train local counterparts on environmental requirements and standards across all of the project's activities. Such proposed activities will be included in annual work plans, and results will be reported in annual reports.
- c) The Implementer will have adequate funds to implement environmental mitigation and monitoring measures and will have qualified, A/COR and MEO-approved environmental impact professional(s) (EIP) who will assess and recommend environmental actions to be taken by the project and will coordinate implementation of mitigation measures, monitoring, and reporting.
- d) The implementer is required to prepare a site or route-specific EDF and EMMP identifying potential adverse environmental risks and impacts, mitigation measures, monitoring and inspection schedule, and entities required to insure compliance with the EMMP. The referred EDF/EMMP must be developed and approved by the A/COR and MEO prior to commencement of the activity. Monitoring and mitigation activities must be incorporated into Annual Work Plans and Performance Monitoring Plans. A Template for the EMMP is attached to this IEE.
- e) The Implementer shall develop an Environmental Manual (EM) for NDC activities; the EM should *inter alia*: establish environmental screening, eligibility and selection (exclusion, if appropriate) criteria; provide environmental documentation and reviewed report forms (EDF/RR;) standard environmental mitigation and monitoring measure for the anticipated (sub-) sectoral activities distilled from the guidelines referred to in 4.1.2 above and acceptable best international practice and GOP guidance; and provide acceptable format for an environmental mitigation and monitoring plan (EMMP;) A/COR and MEO shall approve the EM.
- f) The Implementers shall minimize the use of, and properly dispose of, hazardous materials and wastes for all project activities. The Implementers will adhere to US Environmental Protection Agency (EPA) guidance at www.epa.gov/asbestos and www.epa.gov/lead/pubs/renovation.htm for dealing with asbestos and lead.
- g) The recipient will properly manage and dispose of equipment (computers, electric power generation & distribution equipment, laboratory equipment, etc.) when its useful life ends. All such equipment will be disposed of in an environmentally safe manner by a certified company in accordance with Pakistani laws, and in their absence, in accordance with international best practices acceptable to USAID. (Alternatively, when procuring equipment from a licensed provider/dealer an agreement may be reached that such equipment will be returned to the dealer for its environmentally safe disposal.) For procuring of electronic and miscellaneous equipment and furniture, the Implementers will adhere to USAID's general policies on commodity eligibility provided at <http://www.usaid.gov/ads/policy/300/312> and will not finance unsafe or ineffective products, such as certain pesticides, food products, or pharmaceuticals and other commodities not eligible for financing under this policy.
- h) All environmental conditions established in this IEE, including completed EDFs, EMMPs, and EAs shall be duly transposed into the Contract(s), Cooperative Agreement(s), and all sub-contracts and sub-agreements.
- i) Implementer(s) shall document and regularly report to USAID on implementation of Negative Determination with Conditions (NDC) activities; reporting will include

photographic documentation and site visit reports confirming implementation of the agreed EMMP, photos of site-specific activities prior to, during, and after rehabilitation and renovation activities, and during operation. All Environmental Compliance Reports will provide details on indicators, mitigation efficacy, and unintended environmental consequences of activities. All inspection reports made by the implementing partner must be in writing, signed by the implementing partner's representative.

- j) All activities that provide "drinking" or potable water require water quality testing. This testing provides proof that the water meets minimum GOP and World Health Organization (WHO) portable water standards determining that the water is safe to drink, and to set a baseline so that any future degradation can be detected. Among the water quality tests that must be performed are tests for the presence of arsenic and the design must ensure that potable water meets USG drinking water standard for arsenic. The Implementer must assure that the (WHO and GOP) standards, and testing procedures are followed for potable water supply activities under this program. The water must be tested at least each quarter for a one year period.
- k) This clearance is granted on the condition that all mitigation and monitoring measures specified in the environmental review are binding requirements.

7.4 Responsibility for Compliance

- a) The USAID Education Office Team Leader, Team Members, A/COR and MEO are responsible for ensuring full compliance with 22 CFR 216, the Agency's environmental procedures, during implementation of their operating unit's strategy. The A/COR authority and responsibilities are delegated by the Contracting/Agreement Officer. The responsibilities of the A/COR and Development Objective Teams include designing, monitoring, and modifying programs, projects, activities and amendments, and Activity Approval Documents.
- b) The A/CORs and MEO will closely monitor all sub-project/activity development. Mission Order 200.6 and Mission Order 200.5 require the MEO to be a core member of all activity design teams. The A/CORs and MEO will ensure that all activities have appropriate initial environmental reviews included and formalized in BEO approved IEEs.
- c) The Mission's Climate Integration Lead (CIL) in the Office of Program Management is a resource person for guidance and advice on climate risk assessment, monitoring and mitigation, and the integration of climate resilience in strategies, projects and activities in the Mission.
- d) The primary burden of field compliance with USAID's environmental regulations falls on implementing partners (contractors, grantees, and participating agencies) who receive USAID funds for activities. Each implementing partner must demonstrate to USAID/Pakistan that it is in compliance with USAID's environmental regulations. The USAID A/COR is responsible to ensure compliance through oversight management, regular monitoring, and review of reports.
- e) USAID/Pakistan is responsible for conducting IEEs prior to obligation of funds to implementing partners, and for actively monitoring ongoing activities for compliance, modifying or ending activities that are not in compliance, and ensuring that adequate time and resources are available to bring all activities into compliance with the requirements of this IEE (ADS 204.5.4). If additional activities not described in this document are

added to this project, an amended environmental examination must be prepared.

7.5 Summary Threshold Determinations

A summary of the Threshold Determinations for the new activities are presented in Table 6 below.

Table-6: Summary Threshold Determinations for New Project Activities

| Activities | | Effects on natural or physical environment | Determination and Regulation 216 action required |
|---|---|--|--|
| Categorical Exclusion | | | |
| <ul style="list-style-type: none"> • Project / Program Management • Technical assistance, capacity building, advocacy, training programs except to the extent such programs include activities directly affecting the environment. • Financial, accounting, management and other capacity building | | No adverse effect on the natural or physical environment. | Categorical Exclusion per 22 CFR 216.2(c)(2)(i) |
| <ul style="list-style-type: none"> • Development of manuals and documents etc. • Studies required to support activities of the project/program • Analyses, investigations, reviews, assessments, restructuring and business plans, planning, studies (feasibility, monitoring, impact evaluation, and other social/technical studies, etc.), surveys, mapping, workshops, seminars, conferences, meetings, policy reforms, resource planning, policy and governance assistance | | No adverse effect on the natural or physical environment. | Categorical Exclusion per 22 CFR 216.2(c)(2)(iii) |
| <ul style="list-style-type: none"> • Document and information transfer • Public awareness/communication/outreach campaigns, media campaigns, advocacy/information campaigns and Public information campaigns • Discussion panel(s) organized on television / radio and/or other conference and meetings • Public service announcements (PSAs) produced for print media, social media, television and radio. | | No adverse effect on the natural or physical environment. | Categorical Exclusion per 22 CFR 216.2(c)(2)(v) |
| Negative Determination with Conditions | | | |
| Provision of furniture, equipment, tools, machines, vehicles, computers; IT equipment, multimedia, laboratory, electronic etc. | Minor to moderate adverse effects on the natural or physical environment. | Negative Determination with Conditions per 22 CFR 216.3 (a)(2)(iii) The recipient will properly manage and dispose of equipment (tools, machines, vehicles, computers; IT equipment, multimedia, laboratory, electronic etc.) when its useful life ends. All such equipment will be disposed of in an environmentally safe manner by a certified company in accordance with Pakistani laws, and in their absence, in accordance with international best practices acceptable to USAID. (Alternatively, when procuring equipment from a licensed provider/dealer an agreement may be reached that such equipment will be returned to the dealer for its environmentally safe disposal.) For procuring of electronic and miscellaneous equipment and furniture, the Implementers will adhere to USAID’s general policies on commodity eligibility provided at http://www.usaid.gov/policy/ads/300/31251m.pdf and will not finance | |

| | | |
|--|--|---|
| | <p>unsafe or ineffective products, such as certain pesticides, food products, or pharmaceuticals, and other commodities not eligible for financing under this policy.</p> <p>A/COR is required to review the equipment purchase to see that there is relevant discussion about disposal in the documents that accompany the equipment to the end user.</p> | |
| <p>Policy Implementation support: Policy research and technical assistance for stronger, decentralized policy planning, implementation, coordination, management and accountability to promote gender equity in education and the workforce</p> | <p>No adverse effect on the natural or physical environment.</p> | <p>Categorical Exclusion per 22 CFR 216.2(c)(2)(i)</p> |
| <p>Social Awareness and Marketing: Efforts to influence parental, community, and public views on the importance of gender equity in education and the positive role that men and women can play to promote adolescent female development and opportunities</p> | <p>No adverse effect on the natural or physical environment.</p> | <p>Categorical Exclusion per 22 CFR 216.2(c)(2)(i)</p> |
| <p>Skills Development: Formal and non-formal opportunities for adolescent girls and young women to develop workforce and soft skills for employability and entrepreneurship</p> | <p>Minor to moderate adverse effects on the natural or physical environment.</p> | <p>Negative Determination with Conditions per 22 CFR 216.3 (2)(iii) Conditions are that these activities have a site specific EDF with an EMMP Refer to Section 7.3 above for other conditions</p> |
| <p>Linkages to Industry: Identify willing partners in relevant fields that can link to educational institutions to provide learning/work opportunities; develop partnerships to leverage USAID investment with private sector/industry inputs, contributions or efforts</p> | <p>Minor to moderate adverse effects on the natural or physical environment.</p> | <p>Negative Determination with Conditions per 22 CFR 216.3 (2)(iii) Conditions are that these activities have a site specific EDF with an EMMP Refer to Section 7.3 above for other conditions</p> |
| <p>Grant Fund</p> | | |
| <p>Development of manual for the use of the Grant Fund by the implementing partner</p> | <p>No adverse effect on the natural or physical environment.</p> | <p>Categorical Exclusion per 22 CFR 216.2(c)(2)(i)</p> |
| <p>Grants awarded to non-government counterparts for activities such as technical assistance to conduct assessments or analyses, training and the preparation of</p> | <p>Minor to moderate adverse effects on the natural or physical</p> | <p>Negative Determination with Conditions</p> |

| | | |
|---|---------------------|--|
| <p>manuals and training materials, small business activities, advocacy, institutional capacity building and community mobilization. Construction activities are not included.</p> | <p>environment.</p> | <p>per 22 CFR 216.3 (2)(iii) Conditions are that these activities have a site specific EDF with an EMMP Refer to Section 7.3 above for other conditions. The grant manual must include a separate annex on Environmental Compliance Requirements that outlines the procedures for screening of activities with the requisite EDF/EMMP templates attached.</p> |
|---|---------------------|--|

8 ALLOCATION, TRAINING AND REPORTING REQUIREMENTS:

- Reports will be submitted to the A/CORs.
- Progress reports submitted by Implementing Partners to USAID shall contain a section specific to environmental mitigation and monitoring and will include photographic documentation, site visit reports and project summaries along with environmental impacts, success or failure of mitigation measures being implemented, results of environmental monitoring, and any major modifications or revisions to the project, environmental mitigation measures, or environmental monitoring procedures.
- On the request of the Implementer, the A/CORs and MEO/DMEO will provide training on the environmental compliance as appropriate. The A/CORs will determine when and if this training is required. The A/CORs or MEO/DMEO will explain to the Implementing Partner(s) all environmental conditions established in this IEE and their applicability to specific activities.
- The A/CORs are encouraged to continue monitoring the possible impacts of climate change on project activities as circumstances may change. The CIL is a technical resource for guidance on climate risk assessment, monitoring and mitigation.
- All USAID implementers and beneficiaries that use or procure pesticides with project assistance perform IPM and Safe Pesticide Use training in accordance with the recommendations of BEO/OAPA-approved “2014 Pakistan Programmatic PERSUAP (2014 PPERSUAP), as amended, provided at:
<http://gemini.info.usaid.gov/egat/envcomp/repository/pdf/40676.pdf>

9 LIMITATIONS OF THE IEE

This assistance does not cover activities involving:

1. Assistance, procurement or use of genetically modified organisms (GMOs), will require preparation of biosafety assessment (review) in accordance with ADS 201.3.11.2(b) in an amendment to the IEE reviewed by the Agency Biosafety Review Advisor and approved by BEO-OAPA.
2. Procurement or use of Asbestos Containing Materials (ACM) i.e. piping, roofing, etc., Polychlorinated Biphenyl's (PCB) or other toxic/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 Pollutions as provided at: <http://chm.pops.int>).
3. USAID/Pakistan restricts the use of USAID funds, directly or indirectly, to produce, acquire, use, transport, store, sell, or otherwise deal with ammonium nitrate (AN) and calcium ammonium nitrate (CAN) for agricultural or rehabilitation and renovation activities and construction/demolition purposes.
4. Activities involving support to wood processing, agro-processing, industrial enterprises and regulatory permitting
5. Global Development Alliances (GDAs) and/or Development Credit Authority (DCA) activities.

Any of these actions would require an amendment to the IEE duly approved by the BEO/OAPA.

10 REVISIONS

In accordance with 22 CFR 216.3(a)(9,) if a project is revised or new information becomes available, which indicates that a proposed action might be "major" and its effects "significant," the Determination will be reviewed and revised by the originator(s) of the program and projects and submitted through the MEO to the Bureau Environmental Officers, OAPA, for approval. If warranted, an environmental assessment will be launched and a scoping statement and environmental assessment report prepared. The scoping and EA process, if determined necessary during scoping, will follow and comply with 22 CFR 216.3(a)(4). It is the responsibility of the COR/AOR/ or G2G Project Manager to timely inform the MEO and BEO-OAPA of any changes in the scope and nature of approved activities, which may warrant the revision of the approved threshold decisions.

Attachments:

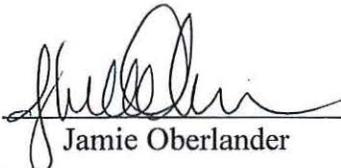
Attachment 1: Environment Documentation Form (EDF) Template

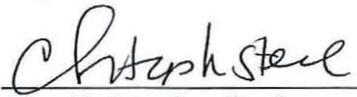
Attachment 2: Environmental Mitigation and Monitoring Plan (EMMP)

**US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE) – PGEE PAD**

CLEARANCE / APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

CLEARANCE:

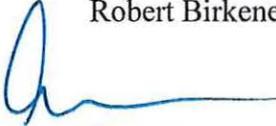
Activity Manager:  Date: 10/24/2016
Jamie Oberlander

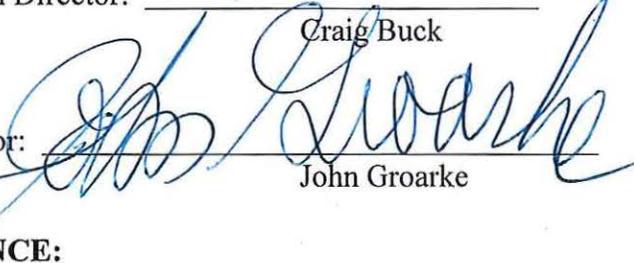
Office Director:  Date: 24 Oct 16
Christopher Steel

Mission Environmental Officer:  Date: 10/24/2016
Howard Batson

Regional Environmental Advisor: Cleared in draft Date: 10/23/2016
SCA & OAPA Andrei Barannik

Office Director:  Date: 24 OCT 2016
(OPM) Robert Birkenes

Deputy Mission Director:  Date: 10-26, 2016
Craig Buck

Mission Director:  Date: 
John Groarke

CONCURRENCE:

Bureau Environmental Officer: _____ Date: _____
William Gibson

Distribution: 1). Project files, 2). Mission IEE Data base, 3). OAA, 4). RLA



Howard Batson <hbatson@usaid.gov>

Re: Pakistan: Draft IEE PGEEE (Education)

Andrei Barannik <abarannik@usaid.gov>

Sun, Oct 23, 2016 at 10:16 AM

To: Howard Batson <hbatson@usaid.gov>

Cc: Usman Asghar Qureshi <uaqureshi@usaid.gov>, Kevin Roberts <kroberts@usaid.gov>, Christopher Steel <csteel@usaid.gov>, Jaime Oberlander <joberlander@usaid.gov>, Mariam Ubilava <mubilava@usaid.gov>, Asim Aziz <aaziz@usaid.gov>, Robert Birkenes <rbirkenes@usaid.gov>

Howard - reviewed - looks OK - pls un-check "deferral" on the facesheet. With this, please have the IEE duly signed in the Mission, put "cleared by e-mail" on REA line and send it to Will Gibson, Acting BEO/Pakistan and BEO/Asia (cced Erin Laws) for his review and concurrence. W/r from sunny Kabul, Andrei P.S. Pls offer help to OAA to transpose all conditions as relevant in respective procurement instruments, and remind of the need for MEO to attend a "post-award" conference.

[Quoted text hidden]

**Environmental Documentation Form (EDF)
Promoting Gender Equity and Empowerment Through Education**

A. Applicant information

| | |
|-----------------------------------|---|
| Contractor/grantee (organization) | Parent grant or project |
| Individual contact and title | Address, phone and email (if available) |
| Activity (brief description) | Amount |
| Location of activity | Start and end date of activity |

B. Activities, screening results, and recommended determination

| TABLE 1 Proposed Sub-activities | Screening result (Step 3 of instructions) | | | Recommended Determinations (Step 6 of instructions. Complete for all moderate and high-risk activities) | | |
|--|--|---------------|-----------|--|---|----------------------------|
| | Very Low Risk | Moderate Risk | High Risk | No significant adverse impact | With specified mitigation, no significant adverse impact, | Significant Adverse impact |
| 1. | | | | | | |
| 2. | | | | | | |
| 3. | | | | | | |
| 4. | | | | | | |
| 5. | | | | | | |
| 6. | | | | | | |

(continue on additional page if necessary)

C. Summary of recommended determinations (check all that apply)

| | |
|---|--|
| <input type="checkbox"/> The activity contains. . . | <i>(equivalent regulation 216 terminology)</i> |
| <input type="checkbox"/> Very low risk sub-activities | <i>categorical exclusion(s)</i> |
| <input type="checkbox"/> After environmental review, sub-activities determined to have no significant adverse impacts | <i>negative determination(s)</i> |
| <input type="checkbox"/> After environmental review, sub-activities determined to have no significant adverse impacts, given | <i>negative determination(s) with conditions</i> |

| | |
|---|----------------------------------|
| appropriate mitigation and monitoring | |
| <input type="checkbox"/> After environmental review, sub-activities determined to have significant adverse impacts | <i>positive determination(s)</i> |

D. Certification:

I, the undersigned, certify that:

1. The information on this form is correct and complete
2. The following actions have been and will be taken to assure that the activity complies with environmental requirements established for PGEEE under the Code of Federal Regulations 22 CFR 216:

These design elements and best practices will be followed in implementing this activity, except with the approval of USAID.

Any specific mitigation or monitoring measures described in the attached information will be implemented in their entirety.

Compliance with these conditions will be regularly confirmed and documented by on-site inspections during the activity and at its completion.

(Signature)

(Date)

BELOW THIS LINE FOR USAID USE ONLY

Approval

USAID AOR

Approved

Rejected (print name)

(signature)

USAID MEO

Approved

Rejected (print name)

(signature)

USAID comments: (if documentation is rejected, comments must be provided to applicant)

Attachment 2

Environmental Mitigation & Monitoring Plan (EMMP)

- An EMMP should either be included in or developed for (1) **all IEEs** that have at least one “Negative Determination with Conditions” (or for activities for which an environmental review has been completed pursuant to an IEE requirement) and (2) all Environmental Assessments (EAs).
- If the EMMP is not developed as part of the IEE, the implementing partner should usually lead development of the EMMP, subject to review and oversight by the MEO and AOR.
- In all cases, the tasks identified in the EMMP are incorporated into the implementing partner’s Work Plan, budget, and reporting.
- The following EMMP format is recommended. It can be adapted, as necessary.

Environmental Mitigation and Monitoring Plan:

Activity Title:

Implementing Partner:

| Activity | Mitigation Measure(s) | Monitoring Indicator(s) | Monitoring and Reporting Frequency | Party(ies) Responsible | Indicative Budget |
|--|--|---|---|---|--------------------------|
| List all activities in IEE that received a “negative determination with conditions.” <i>Do not list any other activities in separate rows.</i> | If mitigation measures are well-specified in the IEE, quote directly from IEE If they are not well-specified in the IEE, define more specifically here. | Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.) | For example: “monitor weekly, and report in quarterly reports. If XXX occurs, immediately inform USAID activity manager.” | If appropriate, <i>separately</i> specify the parties responsible for mitigation, for monitoring and for reporting. | |
| | | | | | |

