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**US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE)
USAID/Pakistan Community Resilience Project**

Project/Activity Data:

Activity/Project Title: Community Resilience Project		Solicitation #: N.A.
Contract/Award Number (if known):		
Geographic Location : Pakistan; 391		
Originating Bureau/Office: USAID Pakistan, Office of Stabilization and Governance		
Supplemental IEE:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DCN and date of Original document:
Amendment:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DCN and ECD link(s) of Amendment(s): N.A
Programmatic IEE:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Amendment No.: NA
Funding Amount: \$156,400,000		Life of Project Amount: \$156,400,000
Implementation Start/End: October 1, 2016 to September 30, 2021		
Prepared By: Guy Martorana		Date Prepared: September 29, 2016
Expiration Date (if any): January 30, 2022		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 type="checkbox"/> Human Health <input checked="" type="checkbox"/> Other <input type="checkbox"/>		
Recommended Threshold Determination: <input checked="" type="checkbox"/> Negative Determination <input checked="" type="checkbox"/> with conditions <input checked="" type="checkbox"/> Categorical Exclusion <input checked="" type="checkbox"/> Positive Determination		<input type="checkbox"/> Deferral <input type="checkbox"/> Exemption <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: Included		

US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE)
USAID/Pakistan Community Resilience Project

SUMMARY OF FINDINGS:

1.0 Background and Project/Activity Description:

1.1 Purpose and Scope of IEE

The purpose of this Initial Environmental Examination (IEE), in accordance with 22 CFR 216, is to provide a new review of the reasonably foreseeable effects on the environment, as well as recommend Threshold Decisions, for the USAID/Pakistan Community Resilience Project (CRP or the Project) based on the present design and components of the Project. This IEE provides a brief statement of the factual basis for a Threshold Decision as to whether an Environmental Assessment or an Environmental Impact Statement is required for the Project.

1.2 Background

Over the last decade, more than 59,000 lives have been lost in terrorism-related violence in Pakistan. Such violence and extremism may be a nation-wide problem in Pakistan, but research and empirical evidence show that the manifestations and causes of violence are local phenomena that are not consistent from place to place, and that youth (young men and women ages 15-29), which account for 30 percent of Pakistan's population, are the prime targets of radicalization efforts by violent extremists. Accordingly, to reduce violent extremism, security and development experts advocate that violence prevention efforts need to be inclusive of local stakeholders and demand-driven in order to adapt interventions to the local context and promote local ownership. Experts also suggest that effective violence prevention initiatives must take into account, and focus efforts on Pakistan's youth.

The Project describes the Mission's five-year plan to achieve Intermediate Result ("IR") 3.2 "Increased Resilience in Targeted Communities Vulnerable to Violent Extremism" of the Mission's Strategic Framework. The Project has three overarching objectives which constitute the Project components: 1) Improving Sub-national Governance; 2) Increasing Broad-based Citizen Engagement in Community Decision-making; and 3) Enhancing Tolerance Within and Across Communities. The Project includes an approximately \$70 million follow-on activity that will continue countering violent extremism ("CVE") programming after USAID's Office of Transition Initiatives ("OTI") ceases operations in Pakistan in 2018. This activity will mirror OTI's dynamic programming model. It will target communities in Karachi, Northern Sindh, Southern Punjab, parts of Khyber Paktunkhwa (KP), and other geographic areas as needs arise and drivers of conflict evolve. In addition, four existing activities are being subsumed under the Project that will contribute to Project objectives.

Lessons Learned:

Municipal construction in a congested city like Jacobabad is a challenging job. High risk activities such as excavation, heavy lifting, and cutting & welding works are happening on roads and streets in close proximity to the general public. In these conditions, compliance with the acceptable Occupation Health and Safety (OHS) standards, and environmental standards is very challenging. The situation is made even more complicated by the fact that small-scale local contractors have limited experience in OHS and environmental compliance.

Under the Sindh Municipal Services Program (MSP), Occupational Health and Safety (OHS) and environmental compliance have been included in construction contracts, with requirements for environmental screening through the use of Environmental Documentation Forms (EDF) and the preparation of Environmental Mitigation and Monitoring Plans (EMMP). The contractors are bound to introduce all required measures to safeguard the health and safety of the general public and workers. Barricading of sites, installing informational and warning sign boards, providing alternate access routes, and socializing the imminent construction well in advance with the general public are some of the measures that the construction contractors were required to undertake in order for safe construction. At the same time, the USAID architect-engineering (A&E) contractor, through its environmental experts, provided formal and informal training to the site staff of the contractors to make them aware of the importance of occupational health, safety, and environmental mitigation. The A&E contractor, Assistance/Contracting Officer's Representative (A/COR) and Mission Environmental Officer (MEO) provide oversight monitoring of EDF/EMMP compliance through review of reports and sites visits.

Although the Youth Employment activity is a Public International Organization (PIO) grant to the United Nations Development Program (UNDP) and, therefore, having a categorical exclusion, there is still oversight monitoring by the AOR and the MEO through site visits and review of project reports. With the categorical exclusion, there are no EDF/EMMP conditions for the Youth Employment activity emanating from the IEE to monitor. In the amendment to the IEE (OAPA-14-PAK-AUG-0076), a condition was included to have the Mission's Office of Infrastructure and Engineering (OIE) review and approve construction and design activities not included in the PIO grant. This was based on lessons learned from other activities. It also signaled closer monitoring of the conditions contained in the EMMP by OIE, the AOR and MEO.

1.3 Description of Activities:CRP-Aligned Activities

The Project includes four ongoing activities that contribute to the IR 3.2 in the Mission Strategic Framework, and Project objectives. A summary description of the activities, and the amounts attributed to the Project are indicated in the table below (Table 1). These activities are: the Youth Employment Activity, implemented by the United Nations Development Program; the Punjab Youth Workforce Development Activity, implemented by the Louis Berger Group; the Municipal Services Program in Sindh – Jacobabad Community Mobilization Component; and

the Municipal Services Program in Sindh. The budget amounts shown in Table 1 do not reflect the total life of project funding but only the amounts that are being attributed to the Project.

Table 1: Summary Existing Project Activities

Award Name	Activity Description	IEE Tracking Number	ETD
Youth Employment Activity	The activity will invest in tested approaches to expand economic opportunities for youth by enabling them to increase their income, seize new work-learning opportunities, build skills valued by employers, and strengthen the capacity of the workforce system to meet private sector demand. The activity has three inter-related inputs, skills training, capacity development of a local training provider and policy research/advocacy on issues related to growth of the garment industry. This activity contributes to objective 3 of the Project by enhancing tolerance within and across communities. \$10,000,000 is being attributed.	OAPA-14-OCT-PAK-0001 Amendment 1: OAPA-14-AUG-PAK-0036	CE NDC
Punjab Youth Workforce Development Activity	The activity focuses on empowering disadvantaged youth by providing them with income-earning opportunities that will counter the attraction of violent criminal activities or violent extremism, improve resilience and reduce vulnerabilities in areas of concern for instability. The activities will provide youth with benign, non-violent, market-driven vocational skills and employment opportunities while exposing them to new ideas and people with different backgrounds. This activity contributes to objective 3 of the Project by enhancing tolerance within and across communities. \$7,530,000 is being attributed.	OAPA-14-OCT-PAK-0001	CE NDC
Municipal Services Program - Sindh	MSP is comprised of several different activities taking place in various regions throughout Pakistan, including in Sindh, implemented by the Government of Sindh. These activities support the provincial governments in their efforts to upgrade water and sanitation systems, improve delivery systems and create public awareness campaigns on the topic of good hygiene habits. This activity contributes to Project Objectives 1 and 2 by improving sub-national governance, increasing state-citizen engagement, and providing opportunities for community-led decision-making. \$38,837,228 is being attributed.	OAPA-13-SEPT-PAK-0023 Amendment 1: OAPA-16-OCT-PAK-0003	CE NDC PD

These activities were previously approved under existing Project Approval Documents and have approved IEEs (see Section 6.2.1). 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. For the purposes of this threshold decision, only the new interventions, including a grant fund, contributing to the three Project components described below are considered.

Component 1: Sub-National Governance Improved

An in-depth analysis of public sentiment has shown that citizens are dissatisfied with the current state of governance, particularly the capacity for essential services provision. And, there is a deficit of trust between the Government of Pakistan (GOP) and its citizens. The root cause of these issues stems from a sense of deprivation and exclusion, particularly in rural areas. This dissatisfaction and distrust of government legitimizes the presence of non-state and illicit actors which, in turn, results in a higher risk of extremism and radicalization. If these root causes are not addressed through strategic interventions, then there will remain a high risk of violence and extremism. The Project will incorporate and continue existing activities to work with governments (at various levels) to strengthen community resilience in areas vulnerable and prone to violent extremism (“VE”). Through a community-led approach, the Project will improve the ability of local government to connect with citizens to implement community-based initiatives that are identified through an inclusive process. At a minimum, this would address effective governance in an equitable manner, creating positive engagement opportunities for youth, increasing the community’s participation and ownership in decision-making processes, and establishing/strengthening mechanisms to foster interaction between communities and governments.

Illustrative Activities:

- Provide technical assistance to increase government’s abilities to counter VE and provide basic services; and
- Establish clear operating procedures to facilitate government’s participation in CRP initiatives.

Component 2: Increased and Broad-based Citizen Engagement in Community Decision-making

The main objective of the Project is to promote community resilience to reduce violence and extremism in focus areas. For purposes of the Project, community resilience is defined as the ability of a community to identify and analyze its vulnerabilities and to develop mechanisms that the community could use to: (1) prevent, withstand, and mitigate the stress of a potential shock; and (2) recover in a way that restores the community to a state of self-sufficiency and/or social functioning.

The Project will focus on building communities’ resilience to endure, overcome and prevent VE. It will work with concerned ministries, local governments, community groups and the private sector to reclaim physical and intellectual space for moderate voices, implement components of

the GOP's National Action Plan to fight terrorism that support Project objectives, and foster a network of stakeholders that share positive values. The Project will take a trial-based approach to addressing various theories of change and drivers of violence, with a preference for small-scale interventions. To the extent possible, interventions will foster trust between local governments and communities. The Project also will support two-way communication forums for policy-makers to discuss critical issues faced by their constituents.

Illustrative Interventions:

- Continue supporting existing OTI community violence prevention activities located in target areas;
- Institutional strengthening of community-level groups with the substantial involvement of youth;
- Build the capacity of key stakeholders, youth, women, business leaders, public representatives/officials, including those in the media, to reinforce an understanding of key peace-building and conflict transformation processes;
- Conduct research, assessments and analyses to inform programming; and
- Facilitate public consultations with government representatives.

Component 3: Tolerance Within and Across Communities Enhanced

The essence of this objective is to bring people together, share information, and stimulate collaboration to increase tolerance and provide alternatives to the violent extremist narratives, for example, by creating safe public spaces. This includes activities to support moderate voices and inter- and intra-community interaction to increase tolerance and social capital, and counter violent extremist narratives that find ideological traction in vulnerable communities.

The Project's activities will promote tolerance within the community, give youth a sense of belonging and structure, and foster stronger linkages within and among communities, directly reducing the effects of key drivers of ongoing instability and violence in Pakistan. To reduce the attraction of extremism or violent criminal activities that underpin instability, the Project plans to provide youth and marginalized groups with benign activities and opportunities for social and recreational activities and, if practicable, expand economic opportunities.

Religious clerics and scholars are uniquely positioned to influence people's beliefs about social norms, especially to counter extremist ideologies that may confuse public opinion in the name of religion. Clerics have a regular platform through which to espouse tolerant messages. The Project will support counter narratives to be an alternative to extremist narratives that promote sectarianism and intolerance.

Given the role of perceptions in radicalization and recruitment, media and communications are central to development responses to the drivers of violent extremism and insurgency. This includes support for local media to foster independent voices as a counterweight to extremist ones. Media activities may include supporting advocacy efforts carried out at various

community groups, such as public service announcements, radio programs, theatre performance, editorials, comics, and animated television series.

Illustrative Interventions:

- Continue supporting existing OTI programming that fosters initiatives that increase regular positive interactions of people of different socio-economic, religious, ethnic, and geographic backgrounds within the Project's broader target geographies;
- Sponsor sports leagues, refurbish sports facilities, and use such events to also promote youth-led dialogues, civic education and advocacy. Particular attention should be paid to youth-centered institutions (e.g., youth clubs or sports leagues, summer camps, sport tournaments, theatre or festivals);
- Support campaigns on tolerant attitudes and respect for opinion;
- Rehabilitate or construct multi-purpose community centers that are used for vocational and life-skills training, leadership and civics workshops, health and other technical training, career counselling sessions and recreational or cultural activities for youth;
- Refurbish safe public spaces;
- Promote arts, music, and cultural exchanges within and between different segments of the community; and
- Support local clerics who are promoting peaceful coexistence and creating coalitions across different religious/ ethnic backgrounds.

Grant Fund

The new Community Resilience Activity will include a Grant Fund with grants being awarded to local and international non-government organizations (NGOs) and Community Based Organizations (CBOs). The Grant Fund will be a flexible mechanism that will allow the Project to respond to opportunities and/or crises that may emerge during implementation that may enhance the achievement of the Project's objectives and expected results. The funding level for the Grant Fund is \$50,000,000 over the Life of Project.

This Grant Fund will give USAID the flexibility to quickly and efficiently respond to problems or to design activities that have not been foreseen or anticipated but that offer high pay-off within any of the elements under the Project. Illustrative grant activities include technical assistance to conduct assessments or analyses, training and the preparation of manuals and training materials, small-scale construction or rehabilitation of existing building, small livelihoods or small business activities, grants to NGOs and CBOs for advocacy, institutional capacity building and community mobilization. Technical assistance and training will also be provided to beneficiaries on how to manage grant-making activities in accordance with the grant manual. The small-scale construction/rehabilitation activities will not exceed \$500,000 per grant and, cumulatively, will not exceed \$10 million over the life of project. A manual for the use of the Grant Fund will be developed by the implementing partner for approval of the Assistance/Contracting Officer's Representative (A/COR) and Contracting Officer. A separate, supporting Environmental Manual will be prepared. It will include environmental compliance guidelines consistent with the recommendations and conditions of this IEE, and aspects of Climate Risk Management, as

warranted. Any existing environmental manual(s) may be adapted as appropriate. The manual will be approved by the Assistance/Contracting Officer's Representative (A/COR), and Mission Environmental Officer (MEO). Required project (quarterly, annual, and final) reports must include a section on environmental compliance of grant activities.

Project Budget

The total value of the CRP Project is \$156,367,228. This amount includes \$56,367,228 in attributed funding under existing mechanisms and \$100 million in new activity(ies).

A detailed budget is provided in Table 2 below. It 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 6.2.1 below.

Table 2: Project Illustrative Budget

Ongoing Activities	LOP Attributed to PAD
Youth Employment Activity	\$ 10,000,000
Punjab Youth Workforce Development Activity	\$ 7,530,000
Municipal Services Program - Sindh	\$ 38,837,228
Sub-total- Ongoing Activities	\$ 56,367,228
New Activities	
Community Resilience Activity	\$100,000,000
Total LOP Funding	\$156,367,228

2.0 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.

3.0 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/695610ESW0P10500change0ENVJune02010.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/917000WP0WB0PK00Box385342B00PUBLIC0.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>

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.

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

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>

4.0 LEGISLATIVE AND REGULATORY FRAMEWORK:

4.1 National Environmental Policies and Legislation¹⁰

4.1.1 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.

4.1.2 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.

4.1.3 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).

4.1.4 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.

4.1.5 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.

4.1.6 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.

4.2 Provincial Environmental Policies and Legislation

4.2.1 Punjab Province

4.2.1.1 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.

4.2.1.2 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.

4.2.2 Sindh Province

4.2.2.1 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.

4.2.2.2 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.

4.2.3 Khyber Pakhtunkhwa Province (KPK)

4.2.3.1 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.

4.2.3.2 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.

4.2.4 Balochistan Province

4.2.4.1 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.

4.2.4.2 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.

4.2.4.3 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.

4.2.4.4 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.

4.2.4.5 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.

4.2.5 Gilgit Baltistan Region

4.2.5.1 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.

4.2.6 Azad Jammu & Kashmir (AJK)

4.2.6.1 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.

4.2.6.2 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.

4.2.6.3 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.

4.3 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

4.4 USAID Climate Risk Management 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.

4.5 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. 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 CRP.

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>

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

The Project design team used “USAID’s Climate Risk Screening Tool” 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 take place in Southern Punjab, Karachi, as well as Northern Sindh and, potentially, parts of Khyber Pakhtunkhwa (KP). The assessment 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 twenty-year time

frame on the activities in the four proposed project components. The timeframe was limited to twenty years as the project is largely providing technical assistance and training. There are also small-scale infrastructure activities with individual investments not exceeding \$500,000. These investments can probably be amortized over ten years but, in fact, may last up to twenty years.

Specific questions related to climate risk for the “Governance and Peace and Security” sector, per Agency Climate Change Risk Screening Tool – Facilitator’s Note, updated June 2016, were raised with regard to the project components. The questions on conflict mitigation, peace and reconciliation, and local government and decentralization were particularly pertinent. The analysis revealed that climate impacts such as extreme wet weather, storm surges or droughts, may affect all project components.

In summary climatic stresses and extremes could increase tensions within local communities such that community resilience in terms of its ability of to: (1) withstand, and mitigate the stress of a potential shock; and (2) recover in a way that restores the community to a state of self-sufficiency and/or social functioning is reduced. It could result in a shortage of resources (jobs, food, and shelter) creating stress that exacerbates tensions between various tribes and ethnic groups, thereby reducing the tolerance within and between communities.

These climate stresses could also compromise the ability of local government to provide adequate community services, and fracture fragile relationships between local authorities and CBOs or between CBOs. It is also possible that climate shocks such as floods can affect the small scale construction and rehabilitation done with the Grant Fund. These are all assessed to be moderate risks.

The analysis proposed adaptation measures that can be incorporated into the project design to address the risks identified. The analysis also showed that the Project offers the opportunity to increase the institutional capacity of local government and local community organizations to assess climate risks, plan and implement adaptation measures. These opportunities should also be incorporated in the project design.

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

Table 3: Project-Level Climate Risk Management Summary Table

Illustrative Interventions	Risks	Risk Rating	How Risks Addressed /Accepted	Opportunities to Strengthen Climate Resilience
Component 1: Sub-national Governance Improved	shortage of economic resources to address community expectations could trigger violent extremism	Moderate	Implementing partner to provide training to increase community awareness on climate risks	Opportunity to improve the institutional framework within local community for climate risk assessment and adaptation planning
Component 2: Increased and Broad-based Citizen Engagement in Community Decision-making	shortage of economic resources to address community expectations could trigger violent extremism	Moderate	Implementing partner to provide training to increase community awareness on climate risks	Increased opportunity for various tribes and ethnic groups to coalesce around a common cause - climate adaptation planning
Component 3: Tolerance Within and Across Communities Enhanced	Lack of institutional capacity in local government and CBOs to address climate shocks; and prepare climate risk adaptation plans	Moderate	Local government and CBO awareness on climate risks increased; training provided to increase local government ability to assess risks and improve planning for rehabilitation	Opportunity to improve the institutional capacity of local government for climate risk assessment and adaptation planning
Grant Fund	Damage to infrastructure assets	Moderate	Provide engineering solutions in the design and construction of buildings	Opportunity to train local artisans on engineering solutions to adapt to climate risks

6 PROJECT ACTIVITIES AND RECOMMENDED THRESHOLD DECISIONS & MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION):

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

6.2 Recommended Threshold Decisions

6.2.1 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 \$56.37 million (36% of LOP amount).*** Please refer to the illustrative project budget table (Table 2), Section 1.3 for a breakdown of the \$56.37 million.

Table 4: IEE Approvals for Existing Activities

Activity Name	IEE Approval	LOP Funding	Determination	LOP End Date
Youth Employment Activity	OAPA-14-OCT-PAK-0001 Amendment 1: OAPA-14-AUG-PAK-0036	\$85.7 million	CE, NDC	09/2018
Punjab Youth Workforce Development Activity	OAPA-14-OCT-PAK-0001	\$85.7 million	CE, NDC	09/2018
Municipal Services Program - Sindh	OAPA-13-SEPT-PAK-0023 Amendment 1: OAPA-16-OCT-PAK-0003	\$265 million	CE, NDC, PD	12/2018

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.

6.2.2 New Activities

6.2.2.1 Categorical Exclusion as per 22 CFR 216.2(c)(2)(i), (\$70 million, 45%)

It is recommended for technical assistance, in-kind and monetary grant activities associated with CRP 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 \$70 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.

6.2.2.2 Negative Determination with Conditions per CFR 216.3(a) (2)(iii), (\$30 million, 19%)

A Negative Determination with Conditions is recommended for all other activities undertaken in the project for which a Categorical Exclusion is not recommended. The activities qualifying for a Negative Determination with Conditions are further defined in Section 6.6, 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 \$30 million (19% 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>).

6.3 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 Documentation 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 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.
- An Environmental Manual will be prepared to accompany the Grants Manual. It will include environmental compliance guidelines consistent with the recommendations and conditions of this IEE, and aspects of Climate Risk Management, as warranted. Any existing environmental manual(s) may be adapted as appropriate. The manual will be approved by the

Assistance/Contracting Officer's Representative (A/COR), and Mission Environmental Officer (MEO).

- 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.

6.4 Additional Conditions

6.4.1 Conditions Pertaining to Various Implementing Mechanisms

As the Project will be using a number of different implementing mechanisms, the following table 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	ADS 308.3.11(c), 22

	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.	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> <p>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.</p>	22 CFR 216, ADS 204.3.9

6.4.2 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.

6.4.3 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. This also applies to NDC grant activities with the requirement being included in the grant manual. 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 measures for the anticipated (sub-) sectoral activities distilled from the guidelines referred to in Section 6.3 above and acceptable best international practice and GOP guidance; and provide acceptable format for an environmental mitigation and monitoring plan (EMMP). This also applies to NDC grant activities with the requirement being included in the grant manual. 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.

6.5 Responsibility for Compliance

- a) The Office of Stabilization and Governance 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.

6.6 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 	No adverse	Categorical

<ul style="list-style-type: none"> 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. 	<p>effect on the natural or physical environment.</p>	<p>Exclusion per 22 CFR 216.2(c)(2)(v)</p>
<p>Negative Determination with Conditions</p>		
<p>Provision of furniture, equipment, tools, machines, vehicles, computers; IT equipment, multimedia, laboratory, electronic etc.</p>	<p>Minor to moderate adverse effects on the natural or physical environment.</p>	<p>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 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>Component 1: Sub-National Governance Improved</p>		
<p>Provide technical assistance to increase government’s abilities to counter VE and provide basic services</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>Establish clear operating procedures to facilitate government’s participation in CRP initiatives</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>Component 2: Increased and Broad-based Citizen Engagement in Community Decision-making</p>		

Continue supporting existing OTI community violence prevention activities located in target areas. Examples include: <ul style="list-style-type: none"> • Recreational events that encourage interaction, tours of different cultural sites • Establishment of and support to community centers 	Minor to moderate adverse effects on the natural or physical environment.	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 6.4 above for other conditions
Institutional strengthening of community-level groups with the substantial involvement of youth	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(v)
Build the capacity of key stakeholders, youth, women, business leaders, public representatives/officials, including those in the media, to reinforce an understanding of key peace-building and conflict transformation processes;	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(v)
Conduct research, assessments and analyses to inform programming	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(iii)
Facilitate public consultations with government representatives	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(iii)
Component 3: Tolerance Within and Across Communities Enhanced		
Continue supporting existing OTI programming that fosters initiatives that increase regular positive interactions of people of different socio-economic, religious, ethnic, and geographic backgrounds within the Project's broader target geographies	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(iii)
Sponsor sports leagues, refurbish sports facilities, and use such events to also promote youth-led dialogues, civic education and advocacy. Particular attention should be paid to youth-centered institutions (e.g., youth clubs or sports leagues, summer camps, sport tournaments, theatre or festivals);	Minor to moderate adverse effects on the natural or physical environment.	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 6.4 above for other conditions

Support campaigns on tolerant attitudes and respect for opinion	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(iii)
Rehabilitate or construct multi-purpose community centers that are used for vocational and life-skills training, leadership and civics workshops, health and other technical training, career counselling sessions and recreational or cultural activities for youth	Minor to moderate adverse effects on the natural or physical environment.	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 6.4 above for other conditions
Refurbish safe public spaces	Minor to moderate adverse effects on the natural or physical environment.	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 6.4 above for other conditions
Promote arts, music, and cultural exchanges within and between different segments of the community	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(iii)
Support local clerics who are promoting peaceful coexistence and creating coalitions across different religious/ ethnic backgrounds	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(iii)
Grant Fund		
Development of manual for the use of the Grant Fund by the implementing partner	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
Grants awarded to non-government counterparts. Illustrative grant activities will include technical assistance to conduct assessments or analyses, training and the preparation of manuals and training materials, small-scale construction or rehabilitation of existing building, small livelihoods or small business activities, grants to NGOs and CBOs for advocacy, institutional capacity building and community mobilization. Technical assistance and training will also be provided to beneficiaries on how to manage grant-making activities in accordance with the grant manual.	Minor to moderate adverse effects on the natural or physical environment.	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 6.4 above for other conditions. An Environmental Manual will be prepared that outlines the procedures for screening of activities with the requisite EDF/EMMP templates attached. It will

		<p>include environmental compliance guidelines consistent with the recommendations and conditions of this IEE, and aspects of Climate Risk Management, as warranted. The manual will be approved by the A/COR, and (MEO).</p>
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7 ALLOCATION, TRAINING AND REPORTING REQUIREMENTS:

- a) Reports will be submitted to the A/CORs.
- b) 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.
- c) 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.
- d) 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.
- e) 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>

8 LIMITATIONS OF THE IEE:

This assistance does not cover activities involving:

- a) Assistance, procurement or use of genetically modified organisms (GMOs) will require preparation of a biosafety assessment (review) in accordance with ADS 201.3.9.3.b in an amendment to the IEE reviewed by the Agency Biosafety Review Advisor and concurrently approved by BEO/OAPA.

- b) Assistance, procurement or use of non-native, potentially invasive species of flora and fauna, will require preparation of an appropriate assessment and an amendment to the IEE reviewed and approved by BEO/OAPA.
- c) Procurement or use of Asbestos, Lead and Mercury Containing Materials (ALMCM) i.e. piping, roofing, etc., Polychlorinated Biphenyl's (PCB) or other toxic/hazardous materials prohibited by the US EPA as provided at: <http://www.epa.gov/asbestos>, <http://www2.epa.gov/lead>, <http://www.epa.gov/mercury/> and/or under international environmental agreements and conventions (e.g. Stockholm Convention on Persistent Organic Pollutions as provided at: <http://chm.pops.int>).
- d) 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.
- e) 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.

9 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/PM to 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, in a timely manner.

Attachments:

1. Environmental Documentation Form (EDF) – Template
2. Environmental Mitigation & Monitoring Plan (EMMP) - Template

US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE)
USAID/Pakistan Community Resilience Project

CLEARANCE / APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

CLEARANCE:

Activity Manager: Angelina Allen-Mpyisi Date: 10/17/16
Angelina Allen-Mpyisi

OSG Office Director: [Signature] Date: 10/17/2016
John Allelo

Mission Environmental Officer: [Signature] Date: 10/17/2016
Howard Batson

Regional Environmental Advisor: Cleared by email Date: 10/08/2016
Central, South Asia and OAPA Andrei Barannik

Office Director: [Signature] Date: 21 OCT 2016
(OPM) Robert Birkenes

Deputy Mission Director: [Signature] Date: 10/21/16
Kevin Brownawell

Mission Director: [Signature] (for) Date: 10-27-2016
John Groarke

CONCURRENCE:

~~OAPA/~~ Acting BEO Pakistan and BEO Asia: [Signature] Date: 11/16/16
William Gibson
Gordon Weyhala

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

Attachment 1

**Environmental Documentation Form (EDF)
Community Resilience Project (CRP) Project**

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)

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	<i>negative determination(s) with conditions</i>

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

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 CRP 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

<p>USAID AOR</p>		
<p><input type="checkbox"/> Approved</p>	<p>(print name)</p>	<p>(signature)</p>
<p><input type="checkbox"/> Rejected</p>	<p>(print name)</p>	<p>(signature)</p>
<p>USAID MEO</p>		
<p><input type="checkbox"/> Approved</p>	<p>(print name)</p>	<p>(signature)</p>
<p><input type="checkbox"/> Rejected</p>	<p>(print name)</p>	<p>(signature)</p>

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.	