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Office of Afghanistan & Pakistan Affairs (OAPA)

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/ACTIVITY DATA

Country Code: 306
Program Area: Economic Growth
Development Objective: Sustainable Agriculture led Economic Growth
Intermediate Results: IR 1.1 Employment Opportunities Increased
Country or Region: Afghanistan
Activity Name: Afghanistan Trade and Revenue Initiative (ATARI)
Funding Period: 06/2017 – 06/2022
Life of Project (LOP) Amount: \$49 million
IEE Prepared by: Sayed Khalil Bahrami
Date: Nov 20, 2016
IEE Amendment (Y/N): N

ENVIRONMENTAL ACTION RECOMMENDED:

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

Climate Change Vulnerability Risk None Low Medium High

1.0 PURPOSE, BACKGROUND AND ACTIVITY DESCRIPTION

1.1. Purpose and Background

The purpose of this IEE is to provide threshold determinations for the proposed Afghanistan Trade and Revenue Initiative (ATARI) activity. The recommended action is for a categorical exclusion for the technical assistance and training activities, entailing technical assistance, knowledge transfer training and studies and negative determination with condition for compliance with requirements with the Codex Alimentarius, World Trade Organization and International Organization for Standardization.

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

1.2. Activity Description

The purpose of ATARI is to improve the competitiveness of Afghan exports by strengthening Afghanistan's regional integration and access to international markets, enabling private investment, enhancing transit and trade, and fiscal sustainability through the Transformational Decade.

This will be a five-year activity. The Activity's purpose will be achieved through interventions aimed at improving the capacity of the Government of Afghanistan (GOA) to formulate and implement a liberal policy framework for trade and investment in accordance with international standards; enhancing integration in the regional and world economy through the promotion of trade and transit agreements, enhanced governance of economic corridors, and private sector linkages; strengthening trade facilitation through reforms and adoption of international best practices and standards as related to trade; and strengthening the competitiveness of the Afghan customs, transport and logistics sector.

1.3 Proposed Interventions

ATARI focuses on the following three areas:

Component One will focus on Afghanistan's success of WTO accession with support to the Afghan Government in the post-accession implementation. This will require further capacity building of GOA officials and technical assistance to different entities to comply with WTO post accession process. The component one will also strengthen trade policy and institutional capacity in order to encourage private sector investment, job creation, and economic growth through regulatory reform and improved coordination with public and private sector entities involved in international trade. This component will focus on implementing specific institutional reforms that will lead to improved trade flows between Afghanistan and its trade partners, as well as a more competitive Afghan export sector. Liberalized trade policies and regulations, coupled with enhanced access to regional and global markets, will incentivize the private sector to make the necessary investments Afghanistan needs to ensure long-term broad-based economic growth and sufficient domestic revenue generation. The increased revenue through increased trade will support the fiscal sustainability of Afghanistan's public finances.

Component Two will support the implementation of regulations, and the strengthening of associated institutions, in line with Codex Alimentarius. Agriculture is the largest source of employment within Afghanistan. In order to make the Afghan ag-export sector more competitive, its products must comply with international standards such as WTO Sanitary and Phytosanitary Measures¹, Codex Alimentarius² and standards issued by the International Organization for Standardization (ISO)³. Component Two will also support the Afghan National Standards Authority and private sector entities in increasing the access and availability of International Standards Organization certification and other standardization certifications.

Component Three will support the strengthening trade facilitation through supporting the Customs and Afghan Transport and Logistics sector. Currently Afghanistan's transport and

¹ https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm

² <http://www.fao.org/fao-who-codexalimentarius/en/>

³ <http://www.iso.org/iso/home.html>

logistics sector is one of the least competitive in the world. Strengthening this sector is vital in making Afghan exports more competitive in international markets such as dried fruit, nuts and rugs.

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION⁴

2.1 Locations Affected

The implementing partner will maintain a central office based in Kabul, Afghanistan. No additional, regional offices will be managed or maintained. Activities and work commissioned under the ATARI award will require travel to Afghanistan's main trading hubs and regional trading partners. There are no direct significant environmental effects of the technical assistance, training, and studies to be completed at the provincial, district, or village level. However, since ATARI will assist GOA to adhere to international food safety standards under the Codex Alimentarius as required by the World Trade Organization (WTO), there could be negative effects on public health and the environment if food safety standards are not properly applied. These effects would be nationwide.

2.2 Socio-economic baseline

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

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

⁴ Please see: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2010/04/12/000333037_20100412001029/Rendered/PDF/522110ESW0Whit1anistan0Final0Report.pdf; http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2011/01/11/000333037_20110111004513/Rendered/PDF/E26350SAR1EA1PIBox353824B01PUBLIC1.pdf; http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2010/11/16/000334955_20101116014820/Rendered/PDF/E25860EA0P12031Framework1appraisal.pdf;

national and provincial road construction, water management studies, and alternative power initiatives like micro-hydro power stations.

2.1 Policy, Legal and Regulatory Framework and International Conventions

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

Afghanistan is a party to international agreements on Biodiversity, Climate Change, Desertification, Endangered Species, Environmental Modification, Marine Dumping, and Ozone Layer Depletion. The country also signed the agreement for Hazardous Waste which was recently ratified. Through its predecessor project ATAR, Afghanistan has been able to join the World Trade Organization (WTO) in 2015. In order to accede to the WTO, Afghanistan past laws on trade related intellectual property rights, customs reform, sanitary and phyto-sanitary measures, as well as food safety. The food safety law regulates all aspects of food production, processing, packaging, labeling, transportation, storage and retail sale of both imported and domestically produced food products.

2.2 Environment Law of Afghanistan, 2007

The Environment Law requires the Afghan government to adopt necessary measures to protect natural forests and living conditions of the country. The National Environmental Protection Agency (NEPA) is responsible for the implementation of this law. Following international best practices, NEPA mandates that new activities are screened for potential adverse effects and possible impacts and, if such impacts are likely, a comprehensive mitigation plan is developed for review and approval before the activity can proceed. In June 2009 NEPA issued the first Afghanistan list of the protected species, which included 46 species.

2.3 Land Expropriation Law (LLE), 2005

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

2.4 Water Law, 2004

The Water Law lays out a model for managing Afghanistan's water resources following the principles of Integrated Water Resources Management (IWRM). The law calls for a nested governance structure for water resources decision-making, including participatory models of

community-based management through Water User Associations (WUAs) and Irrigation Associations (IAs), operating within a decision-making framework of River Basin Authorities (RBAs) and River Basin Councils (RBCs) in the five major river basins and 41 sub-basins of the country. It sets out requirements for sustainable water allocation and use, and establishes sanctions and penalties for noncompliance.

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

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

2.6 Afghanistan Labor Law

Afghanistan has ratified 19 ILO Conventions including 5 of the 8 fundamental Conventions. The Afghan Labor Law has been enacted in accordance with Article 48 of the Constitution of the Republic of Afghanistan to explain and regulate the obligations, rights, privileges and social needs of workers. The law is enacted to meet these objectives: 1. Identify, organize and consolidate the work relations of employees. 2. Provide equal job opportunity and support of the employees' rights. 3. Improve the work organization and output, work feedback, properly utilize the human resource and work source, consolidate the work order and product, complete the advanced payroll systems and secure social provisions to improve the level of the material, social and cultural life of the employees. 4. Determine responsibilities and rights for the employees and employers provide protection and technical safety for work; continuously improve relevant skills and capacities for the development and consolidation of the national economy. 5. Complete the labor legislation and equally apply the approved rules and regulations concerning the workers in all aspects of work and products. 6. Facilitate in providing employment services.

Table 1. Selected data for Afghanistan

Socio-Economic Data	Natural Resources/Environment Data		
Total Population- 35.32 million (in 2011)	Land use	hectares	% of total
Population Growth Rate (annual %)- 2.03	Irrigated agricultural land	3,302,007	5.11%
Urban Population (% of total)- 5.69 million (21.9%)	Orchards	94,217	0.15%
Life Expectancy (years)- 49	Rain-fed Agricultural Land	4,517,714	7.00%
Infant Mortality Rate (per 1,000 live births)- 111	Forest Area	1,337,582	2.07%
GDP (current \$)- 19.5 billion (2011)	Total Pasture Area	29,176,732	45.19%
GDP breakdown: Agriculture 34.9 %, Industry 25 % Services- 40 %	Total Land Other-Arid/Desert	26,131,144	40.48%
GDP Growth (annual %)- 8.5	Total Land Area	64,559,396	
Inflation (annual %)- 4.8	Population Density- 54.70 persons/km ² (in 2011)		
Unemployment Rate (annual %)- 35	Livestock: Cattle: 3.72 million, Sheep: 8.77 million Goats: 7.28 million		
	Deforestation Rate (% of change)- 66.5 % (1971-1999)		
	Improved Water Source (% of pop. with access)- 42%		
	Electricity Consumption - 2.226 billion kWh (2009 est.)		

3.0 RECOMMENDED THRESHOLD DECISIONS AND MITIGATION ACTIONS

Below are the recommended actions for the activities described above, their impacts on the environment and recommended Threshold Determinations and Conditions, if any:

Component	Activities	Effects on natural or physical environment	Recommended Threshold Determination
Component 1: Support Trade Policy and Regional Integration	Technical assistance capacity building, training, workshop, conferences, and studies for GOA, private sector, NGOs, media, and academia. Within the Government of Afghanistan: Ministry of Commerce and Industry, Ministry of Finance, Ministry of Justice, Ministry of Agriculture, Irrigation and Livestock, Ministry of Public Health, Afghanistan National Standards Authority, National Environmental Protection Agency (NEPA).	No effect on the natural or physical environment	Categorical Exclusions, no action required per 22 CFR 216.2(c)(2)(i), (iii) and (v)
Component 2 : Compliance with Codex Alimentarius and International Organization for Standardization	Technical assistance capacity building, training, workshops, conferences, and studies for government entities private sector, civil society, academia in Afghanistan. Within the Government of Afghanistan Ministry of Public Health, Afghanistan National Standards Authority, Ministry of Agriculture, Irrigation and Livestock	Potential impact on public health and the environment if appropriate food safety standards are not adhered to	Negative Determination with Conditions Conditions MEO reviews SOW for tasks and concurs to ensure that the SOW is compliant with GOA obligations under multilateral environmental agreements and conventions and those under WTO, e.g. sanitary and phytosanitary measures, pesticide residues, food contaminants, food hygiene, etc.

Component 3: Improved Customs and Tax Administration	Technical assistance capacity building, training, workshop, conferences, and studies for GIROA, private sector, NGOs, media, and academia. Within the Government of Afghanistan: Customs Department Within the Ministry of Finance Ministry of Commerce and Industry, Ministry of Transport and Civil Aviation	No effect on the natural or physical environment	Categorical Exclusions, no action required per 22 CFR 216.2(c)(2)(i), (iii) and (v)
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Table 1. Proposed activities and recommended threshold decisions for the ATARI program.

4.0 CLIMATE CHANGE RISK SCENING

Afghanistan is extremely vulnerable to the impacts from global climate change. Temperatures have been rising and are expected to rise even more and there is an increase in the frequency of extreme weather events such as droughts and rainstorms which may affect water availability and affect crop and livestock production⁵. To minimize the negative impacts of climate change, USAID is required by Executive Order 13677, and ADS 200 and 201 to incorporate climate change risk screening for all new projects as of October 1, 2016. ATARI is a new project and it will be a five-year activity. ATARI's purpose will be achieved through interventions aimed at improving the capacity of the Government of Afghanistan (GOA) to formulate and implement a liberal policy framework for trade and investment; enhancing integration in the regional and world economy; strengthening trade facilitation through reforms and adoption of international best practices and standards; and strengthening the competitiveness of the Afghan customs, transport and logistics sector.

The impact of climate change on the successful implementation of these activities is expected to be low or possibly moderate for instance if agricultural production is negatively affected which would affect Afghanistan's ability to export and to benefit from improved trade policies (Annex I). The project should strive to build awareness and capacity in line Ministries regarding the need for water conservation and climate-smart agricultural techniques. Climate is not expected to be adversely affected by ATARI's activities and no further mitigation is deemed necessary. The IP is expected to complete the Climate Risk Management screening in Annex I within 90 days of signing of the award and MEO is available to facilitate the process.

5.0 ENVIRONMENTAL RECOMMENDATIONS

Recommended Action: Categorical Exclusions (90% of funding)

⁵ <https://www.climatelinks.org/resources/climate-change-risk-profile-afghanistan>

ATARI activities fall under Component 1 (Support Trade Policy and Regional Integration) and 3 (Improved Customs and Tax Administration) do not have an effect on the natural and physical environment fit within the categories listed in 22 CFR 216.2 (c)(2), and are otherwise categorically excluded from any further environmental review requirements. The originator of the proposed action has determined that the proposed activities are within the following classes of actions:

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

Negative Determination with Conditions: (10% of funding)

Activities under Component 2 (Compliance with Codex Alimentarius and International Organization for Standardization) could potentially harm the general population and the environment if proper standards for e.g. food safety, labeling, pesticide residues, food hygiene etc. are not adhered to. To avoid such negative impacts, the Condition will be that the MEO reviews SOW for tasks and concurs to ensure that the SOW is compliant with GIROA obligations under multilateral environmental agreements and conventions and those under WTO, e.g. sanitary and phytosanitary measures, pesticide residues, food contaminants, food hygiene, etc.

6.0 LIMITATIONS OF THE IEE

This IEE does not cover the following:

- Assistance, procurement or use of genetically modified organisms (GMOs) will require preparation of biosafety assessment (review) in accordance with ADS 201.3.12.2(b) in an amendment to the IEE approved by OAPA BEO.
- Assistance, procurement and use, or both, of non-native, potentially invasive species
- DCA or GDA programs.
- Procurement or use of Asbestos, Lead and Mercury Containing Materials (ALMCM) (i.e. piping, roofing, etc.), Polychlorinated Biphenyl (PCB) containing transformers, or other hazardous/toxic materials for construction projects, including lead and mercury.
- Procurement, use, or recommendation for use of pesticides both in agriculture and construction. The contractor shall use the Programmatic PERSUAP, OAPA-16-SEP-AFG-0038, approved on September 1, 2016. If new pesticides may be needed, the P-PERSUAP shall be amended.

- Procurement or use of Ammonium Nitrate (AN) and Calcium Ammonium Nitrate (CAN) fertilizers.

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

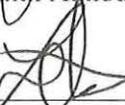
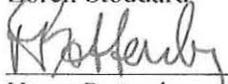
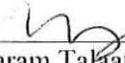
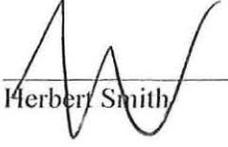
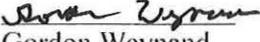
7.0 REVISIONS

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

DCN: OAPA-17-DEC-APG-0007

APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS

Afghanistan Trade and Revenue Initiative (ATARI), IEE

	Clearances:	Date:
A/COR, OBM, Activity Manager	 Judith Almodovar	<u>11-21-2016</u>
Office Director, OEG	 Loren Stoddard	<u>22 Nov 2016</u>
Mission Environmental Officer	 Harry Bottenberg	<u>11/20/2016</u>
Regional Environmental Advisor SCA & OAPA	<u>cleared by email</u> Andrei Barannik	<u>11/21/2016</u>
Resident Legal Officer	 Maram Takaat	<u>11/23/16</u>
Deputy Mission Director	 Michael McCord	<u>11/23/16</u>
Mission Director	 Herbert Smith	<u>11/30/16</u>
	Approval:	Date:
Bureau Environmental Officer/OAPA	 Gordon Weynand	<u>12/5/16</u>

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ANNEX I

Afghanistan Trade and Revenue Initiative (ATARI) activity climate change risk screening (to be completed by IP).

Component	Defined/ Illustrative Interventions	Risks List all risks related to defined/ illustrative interventions that were identified in the screening and additional analysis (to be revised if necessary by IP)	Risk Rating High/ Moderate / Low: to be complete d by IP	How Risks are Addressed To be completed by IP: Describe how the risks have been addressed and/ or additional steps that will be taken to address the risk. If you have chosen to accept the risk, briefly explain why.
Component 1: Support Trade Policy and Regional Integration	Technical assistance capacity building, training, workshop, conferences, and studies for GOA, private sector, NGOs, media, and academia. Within the Government of Afghanistan: Ministry of Commerce and Industry Ministry of Finance, Ministry of Justice, Ministry of Agriculture, Irrigation and Livestock, Ministry of Public Health, Afghanistan National Standards Authority, National Environmental Protection Agency (NEPA).	<ul style="list-style-type: none"> • Damage of agricultural infrastructure due to flooding • Increased soil erosion due to flooding • Soil salinity 	Low	
Component 2 : Compliance with Codex Alimentarius and International Organization for Standardization	Technical assistance capacity building, training, workshops, conferences, and studies for government entities private sector, civil society, academia in Afghanistan. Within the Government of Afghanistan Ministry of Public Health, Afghanistan National Standards Authority, Ministry of Agriculture, Irrigation and Livestock	<ul style="list-style-type: none"> • Reduced yields • Changes in the incidence of crop Pests and livestock diseases 	Low	
Component 3: Improved Customs and Tax Administration	Technical assistance capacity building, training, workshop, conferences, and studies for GIROA, private sector, NGOs, media, and academia. Within the Government of Afghanistan: Customs Department Within the Ministry of Finance Ministry of Commerce and Industry, Ministry of Transport and Civil Aviation	<ul style="list-style-type: none"> • Decreased soil fertility • Heat stress for livestock and field workers 	Low	



Mohammad Mustafa Sultani <msultani@usaid.gov>

Re: ATARI IEE

1 message

Andrei Barannik <abarannik@usaid.gov>

Mon, Nov 21, 2016 at 6:40 PM

To: Harry Bottenberg <hbottenberg@usaid.gov>

Cc: Mohammad Mustafa Sultani <msultani@usaid.gov>, Josephina Cervantes <jcervantes@usaid.gov>, Eric Shutler <eshutler@usaid.gov>, Judith Almodovar <jalmodovar@usaid.gov>, Sayed Khalil Bahrami <skbahrami@usaid.gov>, Olivia Gilmore <ogilmore@usaid.gov>

Harry - looks good - I agree that the IP should be tasked to look into potential climate change impacts and advise on appropriate mitigation and adaptation measures based on the analysis. With this, pls have the IEE duly signed in the Mission, put "cleared by e-mail" on REA line and send it to Gordon Weynand, BEO OAPA, cced Erin Laws, for his review and concurrence. W/r, Andrei

On Mon, Nov 21, 2016 at 7:12 AM, Harry Bottenberg <hbottenberg@usaid.gov> wrote:

See attached, Andrei. I went through this again, attached is the cleaned up version. Cc-ing Olivia in case she has time to look at the climate section (4) on p.7. With policy work is a bit tricky to envision impact of climate change other than reduced agric output could impact the successful implementation of improve policies, trade agreements, norms, etc. The partially completed climate matrix is to be completed by the IP and MEO can facilitate. Am not really sure we need it, seems a bit 'overdone'. But I might be wrong.

This project is to start in June of 2017 (I assume that's correct) so we are still well ahead of game.

Note that there are no 'environmental lessons' from the pre-cursor ATAR project worth mentioning in the ATARI IEE. ATAR (implemented by Chemonics) did an EMMP only for environmentally sound use and disposal of equipment for the ATAR office in Kabul so this EMMP was not really needed- apparently there were no large quantities of equipment e.g. computers that were disseminated to beneficiaries e.g. government counterpart. As you know, when we do a Negative Determination with Conditions for equipment it is for large numbers of computers, printers, generators etc for project beneficiaries, not for an IPs Kabul office.

harry

On Sun, Nov 20, 2016 at 8:50 PM, Andrei Barannik <abarannik@usaid.gov> wrote:

Dear Mustafa - reviewed - my comments/edits are in the attached - pls ask originator to review the text for consistency & re-send a clean cope for quick review. W/r & stay safe, Andrei

On Sun, Nov 20, 2016 at 12:33 AM, Mohammad Mustafa Sultani <msultani@usaid.gov> wrote:

Dear Andrei,

Please find attached final IEE for ATARI for your review and clearance. OEG has incorporated your comments.

Best Regards,
Mustafa

On Sun, Nov 20, 2016 at 9:21 AM, Sayed Khalil Bahrami <skbahrami@usaid.gov> wrote:

Good morning,

Attached please find the revised IEE as per the last comments. I completed the DO and IR comment and added a new language to reflect the Afghan Labor law. I hope this will be final, otherwise will be happy to meet and discuss.

Thanks for your help and please let me know if yo have any question.

On Thu, Nov 17, 2016 at 12:54 PM, Eric Shutler <eshutler@usaid.gov> wrote:

Bahrami, lets get together.

Eric

Eric Shutler
Economic Growth Office
USAID | Kabul
x 3522

