

Annex G: Umbrella IEEs for “Umbrella” Projects

G.1 Umbrella projects and USAID’s Environmental Procedures

The basic procedures described in Chapters 1–4 of this manual assume that proposed activities are sufficiently well-defined that the screening process can be undertaken and, if necessary, an IEE can be prepared.

However, proposals often include activities that are *not* fully defined at the time the proposal is submitted. “Umbrella projects” are a common example of this situation. In an umbrella project, a number of small-scale activities are funded through subgrants under a larger project.

Umbrella projects are commonly used to implement community-driven development schemes. They provide a mechanism to fund community proposals for small-scale activities. They may also be used to fund micro and small enterprise subprojects.

Typically, a USAID partner organization receives overall funding for the umbrella project. The partner then functions as a subsidiary grantmaker, using a portion of the overall funding to award small-scale grants.

Under certain circumstances, however, USAID itself assumes the role of managing the subproject proposal and grant-making process.

In either case, the basic situation is the same: the project includes a large number of activities that are not well-defined at the time of the initial design and proposal. Under USAID’s Environmental Procedures as described in Chapters 1–4, all such “yet to be defined” activities must be deferred because insufficient information is available to write the IEE. And under a deferral, funds cannot be committed or expended.

Attempting to implement an umbrella projects using IEE deferrals would be difficult. Under a deferral, the IEE would need to be amended and re-approved as each sub-activity was developed. Each amendment would require approval by the USAID Bureau Environmental Officer in Washington. This would time-consuming, make the IEE so long as to unmanageable, and impose an impossible workload on USAID’s Washington Bureaus.

***An Umbrella IEE is
only appropriate if:***

- *the proposal consists of multiple activities;*
 - *most of the activities are small-scale but not yet fully designed; and*
 - *an environmental review process can be designed that will review activities as they are designed, and substantially satisfy the requirements of Reg. 216.*
-

Umbrella IEE and rural roads activities

One particularly useful application of the “umbrella” and the ESF is with small-scale road building and repair.

A special ESF has been adapted from USAID/Tanzania, USAID/Uganda, USAID/Mozambique, USAID/Madagascar, and USAID/Cambodia-approved rural road environmental criteria.

It requires that Partners, local partners, and on-site road engineer(s) be trained to use the criteria to conduct Environmental Reviews (ER).

Annex D contains an example of an umbrella IEE applied to roads activities.

G.2 The “Umbrella IEE” for umbrella projects

The “Umbrella IEE” offers an alternative to the deferral. It permits projects with (1) a large number of activities that are (2) not-well-defined at the time of the proposal to be implemented in an expeditious manner while maintaining compliance with Reg. 216.

The umbrella IEE process functions as follows:

- A *negative determination with conditions* is requested for the small-scale, yet-to-be-determined subgrant activities contained in the project proposal.¹⁸
- The key condition is that a streamlined or simplified environmental review process is created for and applied to the proposed small-scale sub-activities.

This subsidiary environmental review process is applied to these small-scale activities *as they are defined* (i.e., when design and siting decision are being made).

Although simplified, this process must substantially satisfy the requirements of Reg. 216. However, most environmental review documentation is approved by the partner or the mission, not at the BEO level. BEO approval is only required when the subproject environmental review identifies activities high-risk activities or activities with significant potential for adverse impacts.

As with the Reg. 216 process, an activity cannot be implemented until the subsidiary screening and review process is complete, and the documentation has been approved.

The *existence and application* of the subsidiary environmental review process is one condition of the IEE. Other conditions include:

- Demonstrated PVO capacity to carry out environmental reviews (e.g., staff may be required to complete environmental compliance training),
- Applying environmental best practice to planning and design,
- Conducting monitoring and mitigation as appropriate, and
- Reporting on the status of environmental compliance as required or requested.

¹⁸ An IEE can contain both umbrella and non-umbrella elements. See box.

G.3 How is the subsidiary environmental review process established?

The subsidiary environmental review (ER) process established by an umbrella IEE is set out in an *Environmental Review Form (ERF)* and *accompanying instructions for its completion*.

The ERF instructions guide users through the subsidiary screening, review and mitigation process for each set of activities as they are designed. The ERF and the ERF instructions are normally an integral attachment to the approved IEE.

There is no single model of an ERF. The examples presented in the attachments to this annex are meant to be specifically tailored for the requirements of a particular set of activities and a particular national or regional context.

G.4 Who has the power to approve environmental documentation of sub-activities?

Umbrella IEEs are most frequently used when a partner organization receives overall funding for an “umbrella project” that includes a sub-granting process. The Partner organization then functions as a grantmaker, reviewing proposals submitted by communities, local government or other PVOs/NGOs.

Under each umbrella IEE, the respective Mission and Partner will determine what level of sub-activity review and approval will be carried out by the USAID Mission, if any. (As with all IEEs, the concurrence of the BEO is also required for the governing IEE.) The Partner should discuss approval requirements with the Mission when considering an “umbrella” IEE.

Approval of the “umbrella” IEE means that, in most cases, approval of the subsequent environmental reviews (for specific activities or generic sets of activities) is by the Partner or Mission. USAID/Washington concurrence is typically NOT required. The exception is if a proposed activity is high risk or appears likely to result in significant adverse impacts and the need for an Environmental Assessment.

G.5 Attachments

This Annex contains the following attachments

Attachment 1: Template and Guidance for Writing an Umbrella IEE

Attachment 2a: Explanation of the Sample Environmental Review Form (ERF) and ERF Instructions

Attachment 2b: Sample Environmental Review Form (ERF) and ERF
Instructions AND

Sample Supplemental Screening Questions for Natural
Resource Management Activities

Attachment 1 to Annex G: Template and Guidance for Writing an Umbrella IEE

Because an umbrella IEE or IEE component addresses activities for which specific information is not available, standardized umbrella IEE language can often be used.

This section provides general guidance and suggested language for an umbrella IEE. It assumes that the project involves subgrants by the lead partner (the proposing organization) to sub-recipients. It provides section-by-section advice on writing such an umbrella IEE around the basic IEE outline.

Note: This section *supplements* the basic concepts set out in Chapter 4, “Writing the IEE.” Note also **that a sample umbrella IEE is provided in Annex D.**

If you are using the subgrant review process as one component within a larger IEE, the template below will require appropriate modification.

IEE Section 1: Background and Project Description

General guidance	Model language
1.1 Background State the reasons why proposed activities are not well-defined. (For example, because activities will be in response to participant generated needs and proposals.)	
1.2 Description of Activities Indicate the types of activities that are likely. Describe the planned funding levels of the activities. Describe disbursement and implementation arrangements, including whether the activities are food for work, monetization or entail grants to communities or groups. Identify organizations involved in the activities and their roles.]	
1.3 Purpose and scope of IEE <no special guidance>	

IEE Section 2: Country and Environmental Information

General guidance	Model language
2.1 Locations affected	

Briefly describe the environment of the location(s) in which the undefined activities will take place.

Depending on the nature of the proposal, the locations could include an entire country, several regions, scattered locations, or a specific region.

The environment includes physical, biological, health, socio-economic, and cultural aspects. Indicate general environmental issues and trends.

However, because not all locations for future interventions have been identified and because of the variety of environmental situations that might be encountered, this section of the IEE can be neither comprehensive nor detailed

2.2 National Environmental Policies and Procedures

<no special guidance>

IEE Section 3: Evaluation of Project/Program Issues with Respect to Environmental Impact Potential

General guidance	Model language
<p>To the extent that you have information, describe the generic kinds of environmental impacts associated with each activity or type of activity.</p> <p>Note whether there are features of the general environment that make it more likely (or less likely) that such impacts are significant.</p> <p>Take care to assess potential cumulative impacts where a number of activities are to be carried out in close proximity to each other or will add to the impacts of other public or private sector activities.</p>	<p>If your knowledge of potential environmental impacts is limited, insert the following or similar wording:</p> <p><i>The physical and topographic conditions, climate, soils, and ecosystems as well as social and economic characteristics that could be encountered are quite variable.</i></p> <p><i>Because the specific characteristics and locations of these activities are not definitive, the potential for adverse environmental impacts cannot be excluded until additional information about project design and location becomes available.</i></p> <p><i>Therefore, each proposed activity will require environmental review as it is defined. This review will determine the specific nature and magnitude of potential impacts. The activities to be proposed share the common characteristic of being small in scale.</i></p>

IEE Section 4: Recommended Determinations and Mitigation Actions (Including Monitoring and Evaluation)

In comparing the internal organization of an “umbrella IEE” with that of a “classic” IEE, it is Section 4 which differs most strongly. Under Section 4 of an umbrella IEE, the proposing organization and USAID commit to following specific procedures for screening, post-IEE environmental reviews, mitigation, and monitoring (see

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Figure G.1). The proposing organization and USAID also commit to promoting environmental assessment capacity building for their staff and partners.¹⁹:

General guidance	Model language
<p>4.1 Mitigation actions and conditions</p>	<p>The intent of the mitigation actions and conditions detailed in this section is to assure that no subgrant activities with significant, adverse environmental impacts are implemented under this project:</p>
<p>4.1a Environmental Screening and Review Procedures</p> <p>This section describes the subgrant environmental review procedures that will be used by the project.</p> <p>Note: The model language provided assumes that the ENVIRONMENTAL REVIEW FORM provided in this Annex is used.</p>	<p>Environmental screening and review procedures will be adopted for all subgrant activities not defined at the time of the proposal.</p> <p>These procedures are set out in the attached draft Environmental Review Form and accompanying Environmental Review Form instructions. [PROPOSING ORGANIZATION] will prepare or cause to be prepared the appropriate documentation for each activity.</p> <p>Under these procedures, each activity in a subgrant will result in one of three screening results:</p> <ul style="list-style-type: none"> ▪ Very low risk ▪ Moderate or unknown risk ▪ High-risk <p>Activities found to be (1) high risk or (2) moderate/unknown risk will require completion of an environmental review. For each activity, the environmental review will result in one of three possible recommended determinations:</p> <ul style="list-style-type: none"> ▪ No significant adverse impacts ▪ No significant adverse impacts given specified mitigation and monitoring ▪ Significant adverse impacts <p>Final review and clearance authority for the environmental documentation form will lie with the Mission Environmental Officer (MEO), with two exceptions:</p> <ul style="list-style-type: none"> ▪ The environmental reviews and recommended determinations for any “high risk” activities will require clearance by the [Regional Environmental Officer (REO) (if one exists)] and the Bureau Environmental Officer (BEO). ▪ Recommended determinations indicating “significant adverse impacts” will incur Regulation 216 (22 CFR 216) requirements for the conduct of an Environmental Assessment. <p>No subgrant funds will be awarded until environmental</p>

¹⁹ The relationship between the Partner(s) and USAID may differ from that characterized herein. **The sample language should be adapted to the situation at hand.**

General guidance	Model language
	<p>documentation for the subgrant activity has undergone final review and clearance.</p> <p>This clearance is granted on the condition that all mitigation and monitoring measures specified in the environmental review are binding requirements.</p> <p>The attached Environmental Review form is a draft. USAID/[COUNTRY] will facilitate the refinement of this form with [PROPOSING ORGANIZATION] [, the REO, if one exists] and the BEO to meet project needs.</p>
<p>4.1b Capacity-building for Environmental Review</p> <p>The proposing organization should provide evidence that it has, or will acquire, sufficient capacity to complete the environmental screening and review process, and to implement mitigation and monitoring measures.</p> <p>Capacity can be developed through a training program, such as USAID's ENCAP Environmental Assessment and Environmentally Sound Design Course (www.encapafrica.org).</p> <p>If partner organizations will be proposing and implementing subgrant activities, they too, must have sufficient capacity to fulfill the environmental screening and review requirements.</p>	
<p>4.1c Adherence to environmentally sound design principles</p> <p>The proposing organization must certify that it and its partners will follow environmentally sound design best practice in designing and implementing their activities, and in designing mitigation and monitoring measures.</p> <p>Refer to the sources of guidance or expertise that will be used, including USAID's <i>Environmental Guidelines for Small-Scale Activities in Africa</i>.</p>	<p>Proposing organizations and their partners will certify they are following environmentally sound design principles and best management practice in designing their activities. Guidance consulted shall include:</p> <ul style="list-style-type: none"> • USAID's <i>Environmental Guidelines for Small-Scale Activities in Africa</i> (2003) (See www.encapafrica.org) • [Other appropriate project or sector-specific design or BMP resource guides]
<p>4.1d Environmental Monitoring & Evaluation</p>	

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General guidance	Model language
	<p>Mitigation and monitoring measures specified in the environmental reviews submitted under procedures described in 4.1a are binding requirements. [PROPOSING ORGANIZATION] shall assure that these measures are implemented.</p> <p>All periodic reports of the implementing partner to [USAID Country Mission] shall contain an environmental section. This section shall summarize:</p> <ul style="list-style-type: none"> ▪ The state of implementation of environmental mitigation and monitoring measures ▪ Results of environmental monitoring and any unexpected impacts, ▪ The success or failure of mitigation measures being implemented, ▪ Any major modifications/revisions to the project, mitigative measures or monitoring procedures. <p>[USAID Country Mission]'s MEO and the Project Manager will be ultimately responsible for monitoring environmental impacts of all project-financed activities. This may include:</p> <ul style="list-style-type: none"> ▪ monitoring and evaluation of activities after implementation for unforeseen environmental impacts that may need to be mitigated. This process should be integrated into Mission field visits and consultations with [proposing organization] ▪ review of the implementing partner's reports with respect to results of environmental mitigation and monitoring procedures; ▪ reporting on implementation of mitigation and monitoring requirements as part of the summary of activities and their status that is passed to the [REO: Insert if one exists] and BEO; and ▪ recommended adjustments to subproject budgets to address additional mitigation or monitoring needs incorporated in subproject workplans <p>Periodic visits of the [REO: if one exists] or BEO may also be requested for advice, refresher training, and confirmation that environmental processes are in place.</p>
<p>4.1e Adherence to national environmental laws and regulations</p> <p>The IEE should specifically acknowledge that the environmental screening and review procedures described in 4.1a do not substitute for the environmental laws and policies of the host country.</p> <p>If national laws and policies may impose environmental review requirements on likely subgrant projects, these requirements should be noted, and the proposing organization should provide assurance that these national requirements will be followed.</p>	

General guidance	Model language
<p>Towards this end, review and revision of the Environmental Review Form should include elements that will allow the proposing organization to determine whether national environmental review requirements will apply.</p>	
<p>4.1f Adherence to USAID pesticide procedures</p> <p>The environmental screening and review procedures summarized in section 4.1a do not apply to pesticide procurement, use, transport, storage or disposal.</p> <p>The proposing organization should specifically certify:</p> <ul style="list-style-type: none"> ▪ that none of the funded subgrant activities will involve pesticides, OR ▪ that a separate Pesticide Evaluation Report and Safe-Use Action Plan (PERSUAP) has been prepared and approved pursuant to USAID Regulation 22 CFR 216.3 (b) (1) (i) (a-l). <p>See PURSUAP examples at www.encapafrica.org and www.foodaidmanagement.org</p>	<p>This IEE does not cover pesticides or other activities involving procurement, use, transport, storage or disposal of toxic materials.</p> <p>Except as noted in the attached “Environmental Review Form,” any pesticide activities will require an amended IEE.</p>
<p>4.2 Recommended Determinations</p> <p>This section asserts that subgrant activities not yet defined merit a “NEGATIVE DETERMINATION WITH CONDITIONS.”</p> <p>These conditions are all the measures detailed in section 4.1</p>	<p>This Initial Environmental Examination (IEE) satisfies the conditions of the environmental procedures for umbrella activities and delegation of environmental review responsibility to Missions for PVO/NGO umbrella-type projects (Cable 95 STATE 257896).</p> <p>The following determinations are recommended:</p> <p>1. A Categorical Exclusion is recommended for project-financed technical assistance, training and education, institutional strengthening, and information exchange activities that include no physical interventions and no direct effects on the environment.</p> <p>This determination is recommended pursuant to 22 CFR 216.2(c)(1)(i) and 216.2(c)(2)(i), (iii) and (v) <u>[Insert other citations if applicable]</u>. The Environmental Review Instructions and Form will be used to confirm this determination for each activity.</p> <p>Exceptions:</p> <ul style="list-style-type: none"> ▪ This categorical exclusion does not apply to education, technical assistance, or training if such includes activities directly affecting the environment, such as construction of facilities, per 216.2(c)(2)(i), ▪ This categorical exclusion likewise does not apply to studies, projects, or programs intended to develop the capability of recipient countries to engage in development planning when designed to result in activities directly affecting the environment, per 216.2(c)(2)(xiv). <p>2. A Negative Determination with Conditions is recommended for all other subgrant activities not yet</p>

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General guidance	Model language
	<p>defined in detail.</p> <p>This IEE specifies a set of measures (section 4.1 above) to ensure adequate environmental review of USAID-supported activities, and to assure that no subgrant activity with significant adverse environmental impacts will be implemented under this IEE.</p> <p>This determination is recommended with the explicit commitment and understanding that ALL measures set out in 4.1 constitute binding requirements and will be implemented in full.</p>
<p>5.0 Summary of findings</p> <p>This section should contain a <i>summary table</i> listing each activity against its recommended determination.</p> <p>Within the summary table or below it, the CONDITIONS on which the negative determination for subgrant activities depends should be listed.</p> <p>These conditions are:</p> <ul style="list-style-type: none"> ▪ Implementation of environmental screening and review procedures for subgrants, as set out in 4.1a and the attached Environmental Review Form and Instructions ▪ Capacity-building for environmental review (4.1b) ▪ Adherence to environmentally sound design principles in subgrant projects (4.1c) ▪ Appropriate environmental mitigation and monitoring for subgrant projects (4.1d) ▪ Adherence to host country environmental laws and policies (4.1e) ▪ Adherence to USAID pesticide procedures (4.1f) 	

Attachment 2a to Annex G

Explanation of the Sample Environmental Review Form (ERF) and ERF Instructions

The Environmental Review Form (ERF) and the ERF Instructions guide applicants through a simplified EIA process compatible with Regulation 216.

The ERF and the ERF Instructions immediately follow this explanatory text.

This documentation describes the logic behind the form and the environmental screening and review process it creates for activities carried out under umbrella projects. This information is summarized in figure G.1.

NOTE: As stated in the box on the first page of the ERF Instructions, both ERF and the ERF Instructions should be *modified* for the requirements of particular projects and regions.

Screening: the first step

Under this ERF, applicants first **SCREEN** the proposed activities against a listing of designated “low risk” and “high risk” activities. Each proposed activity is then assigned to one of three categories, as described in the table below:

Screening result	Basis
Very low risk of significant adverse environmental impacts	Screening criteria are derived from Regulation 216 categorical exclusions. A complete list of such activities is provided in the ERF Instructions.
High risk	Screening criteria are derived from activities typically requiring an environmental assessment under Regulation 216, and from other statutes and directives. A complete list of such activities is provided in the ERF Instructions.
Moderate or unknown risk	Activities that are neither high-risk nor very low risk are designated “moderate or unknown risk.” Examples of such projects are provided in the form, but these examples are not exhaustive.

NOTICE:

THIS ERF AND ITS DOCUMENTATION ARE A **DISCUSSION DRAFT**.

THEY HAVE BEEN PREPARED FOR THE JOHANNESBURG MEO WORKSHOP IN FEBRUARY 2003 AND WILL BE REVISED BASED ON FEEDBACK FROM THIS EVENT.

The sample Environmental Review Form:

- *guides applicants through a simplified EIA process.*
 - *This process is compatible with Regulation 216.*
-

Use of supplemental screening forms

Supplemental screening questions may be developed for the needs of particular types of activities. These screening forms are used to more specifically identify very low-risk or very high-risk activities.

A sample supplemental screening form for *Natural Resource Management* (NRM) activities is provided here. A “NO” answer to ALL questions on this form indicates that a small-scale NRM activity can be considered “very low risk.” This supplemental form is referenced in the list of “very low risk” activities provided in the ERF Instructions.

Screening outcomes determine the need for further review

For very low risk activities, no further environmental review is needed.

High Risk or moderate/unknown risk activities require completion of an *Environmental Review Report*. This is a typically short (2–3 page) document that resembles a simplified IEE.

Based on the *Environmental Review Report*, applicants provide one of three *Recommended Determinations*, detailed in the table below:

Recommended determination	Meaning
No significant adverse impacts	The activity in question will not result in significant, adverse environmental impacts. Special mitigation or monitoring is not required. Typically does not apply to high-risk activities.
No significant adverse impacts given specified mitigation and monitoring	With the mitigation and monitoring specified in the Environmental Review Report, none of the subgrant activities will result in significant, adverse environmental impacts.
Significant adverse impacts	One or more of the subgrant activities is likely to cause significant adverse environmental impacts and cannot be mitigated with best practices or other measures. A full environmental assessment will be required.

Certifications

The applicant must certify that:

- Those responsible for implementing this activity have received training in environmental review AND training and/or documentation describing essential design elements and best practices for activities of this nature.
- These design elements and best practices will be followed in implementing this activity.
- Any specific mitigation or monitoring measures described in the environmental review 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.

Certification

Regardless of screening outcomes or recommended determinations, applicants must sign a certification section.

The certification commits the applicant to the mitigation and monitoring measures specified in the environmental review, and to assuring that its staff and partners have the capacity to implement environmentally sound best practices. (See box on this page.)

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Approval

The USAID Mission is always the first reviewer of the ERF.

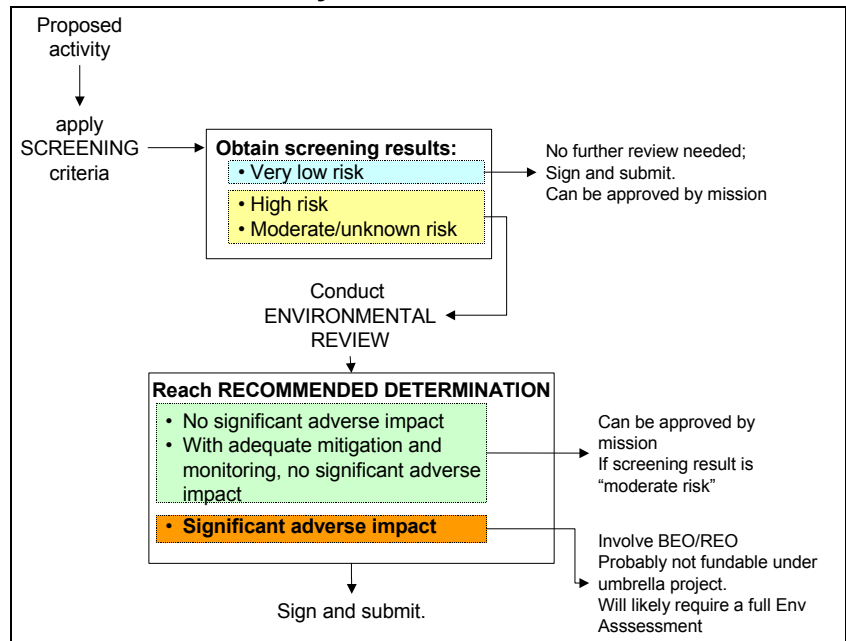
- When screening determines that ALL proposed activities are “Very Low Risk,” the Mission can approve the ERF without higher level approvals.
- In all other cases, approval authority depends on the combination of screening results and the recommended determination. See table below:

Table G.1: Approval authority for the ERF

Screening outcome ↓	Recommended Determination		
	No significant adverse impacts	No significant adverse impacts given specified mitigation and monitoring	Significant adverse impacts
Moderate or unknown risk*	MISSION*	MISSION*	REQUIRES EA. MISSION MUST INVOLVE REO/BEO
High Risk	Unlikely to be a proper determination MISSION + REO/BEO	MISSION + REO/BEO	REQUIRES EA. MISSION MUST INVOLVE REO/BEO

*however, if the activity is of a new type, the mission should involve the BEO/REO.

Figure G.1: Environmental Screening and Review Process created by the Environmental Review Form.



Attachment 2b to Annex G

***Sample Environmental Review Form (ERF) and
ERF Instructions***

***Sample Supplemental Screening Questions for
Natural Resource Management Activities***

Note to individuals adapting the:

- * Africa Bureau Environmental Review FORM &**
- * Environmental Review Form INSTRUCTIONS**

for use on a particular program/activity:

- The Environmental Review Form and its instructions are for use in the review and approval of subproject proposals that are (1) carried out under an “umbrella” project AND (2) defined and reviewed *after* approval of the overall or “umbrella project.” Typical subprojects include microfinance activities or subgrants for small-scale development.
- For primarily NRM-oriented programs, consider and use the Supplemental Environmental Review Form for NRM sector activities, especially those considering NRM-based enterprises, CBNRM, ecotourism, etc..
- Text in **UNDERLINE & BLUE HIGHLIGHT** MUST be modified to reflect project and mission name.
- **Yellow** highlighted text is only put emphasis on the points highlighted, and can also be dropped
- Both the form AND instructions should be reviewed and modified in general to reflect the needs of the specific umbrella project.
- Both form and instructions must be appended to the Initial Environmental Examination for the overall project.

Revision history:

Last revised April 13, 2004, to include biosafety considerations and better reflect the Supplemental Environmental Review Form for NRM sector activities. Formatting and presentation revised 17 Jan 2005.

DELETE THIS PAGE BEFORE MODIFYING/DISTRIBUTING THIS FORM

Program logo
here, if
desired

PROGRAM/PROJECT NAME

USAID/Mission or Bureau Name



Instructions for environmental review of XXX Program/Project activities

Note:

These instructions accompany the “Environmental Review Form for Program/Project Activities.”
Follow, but DO NOT SUBMIT, these instructions.

Who must submit the Environmental Review Form?

ALL implementing Partners applying to implement activities under the XXX Project must complete the “Environmental Review Form” form UNLESS the project or activity is carried out to address an emergency (e.g., international disaster assistance). *Emergencies are determined by the US Ambassador or USAID, not by the applicant.*¹

Importance

The proposed activity cannot be approved and no “irreversible commitment of resources” can be made until the environmental documentation, including any mitigation measures, is approved by the Mission Environmental Officer (MEO). Approval by other authorities in USAID may also be required.

NOTE: USAID may request modifications, or reject the documentation.

If the activities are found to have significant adverse impacts, a full Environmental Assessment must be conducted. RAMP, USAID, and the applicant will confer in any such case to determine next steps.

Step 1. Provide requested “Applicant information” (Section A of the form)

Step 2. List all proposed activities

In Section B of the form, list all proposed activities. Include all phases: *planning, design, construction, operation & maintenance*. Include ancillary activities. (These are activities that are required to build or operate the primary activity. Examples include building or improving a road so that heavy vehicles can reach the project site, excavation of fill material or gravel for construction, provision of electricity, water, or sewage facilities, disposal of solid waste, etc.)

Step 3a. Screening: Identify low-risk and high-risk activities

For *each* activity you have listed in Section B of the form, refer to the list below to determine whether it is a listed low-risk or high-risk activity.

¹ See 22 CFR §216.2(b)(1). Most activities carried out under emergency circumstances are considered EXEMPT from USAID environmental procedures, except for the procurement or use of pesticides

If an activity is specifically identified as “very low risk” or “high risk” in the list below, indicate this in the “screening result” column in Section B of the form.

Very low-risk activities (Activities with low potential for adverse biophysical or health impacts; including §216.2(c)(2))	High-risk activities (Activities with high potential for adverse biophysical or health impacts; including §216.2(d)(1))
<p>Provision of education, technical assistance, or training. (Note that activities directly affecting the environment do not qualify.)</p> <p>Community awareness initiatives.</p> <p>Controlled agricultural experimentation exclusively for the purpose of research and field evaluation confined to small areas (normally under 4 ha./10 acres). This must be carefully monitored and no protected or other sensitive environmental areas may be affected).</p> <p>Technical studies and analyses and other information generation activities not involving intrusive sampling of endangered species or critical habitats.</p> <p>Document or information transfers.</p> <p>Nutrition, health care or family planning, EXCEPT when (a) some included activities could directly affect the environment (construction, water supply systems, etc.) or (b) biohazardous (esp. HIV/AIDS) waste is handled or blood is tested.</p> <p>Rehabilitation of water points for domestic household use, shallow, hand-dug wells or small water storage devices. Water points must be located where no protected or other sensitive environmental areas could be affected.</p> <p>NOTE: USAID guidance on potable water requires water quality testing for arsenic, coliform, nitrates and nitrites.</p> <p>Small-scale construction. Construction or repair of facilities if total surface area to be disturbed is under 10,000 sq. ft. (approx. 1,000 sq. m.) (and when no protected or other sensitive environmental areas could be affected).</p> <p>Intermediate credit. Support for intermediate credit arrangements (when no significant biophysical environmental impact can reasonably be expected).</p> <p>Maternal and child feeding conducted under Title II of Public Law 480.</p> <p>Title II Activities. Food for development programs under Title III of P.L. 480, when no on-the-ground biophysical interventions are likely.</p> <p>Capacity for development. Studies or programs intended to develop the capability of recipients to engage in development planning. (Does NOT include activities directly affecting the environment)</p> <p>Small-scale Natural Resource Management activities for which the answer to ALL SUPPLEMENTAL SCREENING QUESTIONS (see <i>Natural Resources supplement</i>) is “NO.”</p>	<p>River basin development</p> <p>New lands development</p> <p>Planned resettlement of human populations</p> <p>Penetration road building, or rehabilitation of roads (primary, secondary, some tertiary) over 10 km length, and any roads which may pass through or near relatively undegraded forest lands or other sensitive ecological areas</p> <p>Substantial piped water supply and sewerage construction</p> <p>Major bore hole or water point construction</p> <p>Large-scale irrigation</p> <p>Water management structures such as dams and impoundments</p> <p>Drainage of wetlands or other permanently flooded areas</p> <p>Large-scale agricultural mechanization</p> <p>Agricultural land leveling</p> <p>Procurement or use of <u>restricted use</u> pesticides, or wide-area application in non-emergency conditions under non-supervised conditions. (Consult MEO.)</p> <p>Light industrial plant production or processing (e.g., sawmill operation, agro-industrial processing of forestry products, tanneries, cloth-dyeing operations).</p> <hr/> <p><u>High-risk and typically not funded by USAID:</u></p> <p>Actions affecting protected areas and species. Actions determined likely to significantly degrade protected areas, such as introduction of exotic plants or animals</p> <p>Actions determined likely to jeopardize threatened & endangered species or adversely modify their habitat (esp. wetlands, tropical forests)</p> <p>Activities in forests, including:</p> <ul style="list-style-type: none"> ▪ Conversion of forest lands to rearing of livestock ▪ Planned colonization of forest lands ▪ Procurement or use of timber harvesting equipment ▪ Commercial extractin of tiber ▪ Construction of dams or other water control structures that flood relatively undegraded forest lands ▪ Construction, upgrading or maintenance of roads that pass through relatively non-degraded forest lands. (Includes temporary haul roads for logging or other extractive industries)

(This list of activities is taken from the text of 22 CFR 216 and other applicable laws, regulations and directives)

Step 3b: Identifying activities of unknown or moderate risk.

All activities NOT identified as “very low risk” or “very high risk” are considered to be of “unknown or moderate risk.” Common examples of moderate-risk activities are given in the table below.

Check “moderate or unknown risk” under screening results in Section B of the form for ALL such activities.

Common examples of moderate-risk activities	
CAUTION: If ANY of the activities listed in this table may adversely impact (1) protected areas, (2) other sensitive environmental areas, or (3) threatened and endangered species and their habitat, THEY ARE NOT MODERATE RISK. All such activities are HIGH RISK ACTIVITIES.	
<p>Small-scale agriculture, NRM, sanitation, etc. (You may wish to define what “small scale” means for each activity)</p> <p>Agricultural experimentation. Controlled and carefully monitored agricultural experimentation exclusively for the purpose of research and field evaluation of MORE than 4 ha.</p> <p>NOTE Biotechnology/GMOs: No <i>biotechnology testing or release</i> of any kind are to take place within an assisted country until the host countries involved have drafted and <i>approved</i> a regulatory framework governing biotechnology and biosafety.</p> <p>All USAID-funded interventions which involve biotechnologies are to be informed by the ADS 211 series governing “Biosafety Procedures for Genetic Engineering Research”. In particular this guidance details the required written approval procedures needed before transferring or releasing GE products to the field.</p> <p>Medium-scale construction. Construction or rehabilitation of facilities or structures in which the surface area to be disturbed exceeds 10,000 sq. ft (1000 sq meters) but funding level is \$200,000 or less. (E.g. small warehouses, farm packing sheds, agricultural trading posts, produce market centers, and community training centers.)</p> <p>Rural roads. Construction or rehabilitation of rural roads meeting the following criteria:</p> <ul style="list-style-type: none"> Length of road work is less than ~10 km No change in alignment or right of way Ecologically sensitive areas are at least 100 m away from the road and not affected by construction or changes in drainage. No protected areas or relatively undegraded forest are within 5 km of the road. <p>Title II & III Small-Scale Infrastructure. Food for Development programs under Title II or III, involving small-scale infrastructure with the known potential to cause environmental harm (e.g., roads, bore holes). Quantity imports of commodities such as fertilizers</p>	<p>Sampling. Technical studies and analyses or similar activities that could involve intrusive sampling, of endangered species or critical habitats. (Includes aerial sampling.)</p> <p>Water provision/storage. Construction or rehabilitation of small-scale water points or water storage devices for domestic or non-domestic use. (Covers activities NOT included under “Very low risk activities” above.)</p> <p>NOTE: USAID guidance on water quality requires testing for arsenic, nitrates, nitrites and coliform bacteria.</p> <p>Support for intermediate credit institutions when indirect environmental harm conceivably could result.</p> <p>Institutional support grants to NGOs/PVOs when the activities of the organizations are known and may reasonably have adverse environmental impact.</p> <p>Pesticides. .Small-scale use of USEPA-registered, least-toxic general-use pesticides. Use must be limited to NGO-supervised use by farmers, demonstration, training and education, or emergency assistance.</p> <p>NOTE: Environmental review (see step 5) must be carried out consistent with USAID Pesticide Procedures as required in Reg. 16 [22 CFR 216.3(b)(1)].</p> <p>Nutrition, health care or family planning, if (a) some included activities could directly affect the environment (e.g., construction, supply systems, etc.) or (b) biohazardous healthcare waste (esp. HIV/AIDS) is produced, syringes are used, or blood is tested.</p>

Step 4. Determine if you must write an Environmental Review Report

Examine the “screening results” as they are entered in Table 1 of the form.

- If ALL the activities are “very low risk,” then no further review is necessary. In Section C of the form, check the box labeled “very low risk activities.” Skip to Step 8 of these instructions.

- If ANY activities are “unknown or moderate risk,” you MUST complete an ENVIRONMENTAL REVIEW REPORT addressing these activities. Proceed to Step 5.
- If ANY activities are “high risk,” note that USAID’s regulations usually require a full environmental assessment study (EA). Because these activities are assumed to have a high probability of causing significant, adverse environmental impacts, they are closely scrutinized. *Any* proposed high-risk activity should be discussed in advance with USAID.

In some cases, it is possible that effective mitigation and monitoring can reduce or eliminate likely impacts so that a full EA will not be required. If the applicant believes this to be the case, the Environmental Review Report must argue this case clearly and thoroughly. Proceed to Step 5.

Step 5. Write the Environmental Review Report, if required

The Environmental Review Report presents the environmental issues associated with the proposed activities. It also documents mitigation and monitoring commitments. Its purpose is to allow the applicant and USAID to evaluate the likely environmental impacts of the project.

For moderate risk activities, the Environmental Review Report is typically a SHORT 2–3 page document. The Report will typically be longer when (1) activities are of higher or unknown risk, and (2) when a number of impacts and mitigation measures are being identified and discussed.

The Environmental Review Report follows the outline below:

- A. **Summary of Proposal.** Summarize background, rationale and outputs/results expected. (Reference to proposal, if appropriate).
- B. **Description of activities.** For all moderate and high-risk activities listed in Table 1 of the form, succinctly describe location, siting, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during all project phases and who will undertake them. (All of this information can be provided in a table). If various alternatives have been considered and rejected because the proposed activity is considered more environmentally sound, explain these.
- C. **Environmental Situation & Host Country environmental requirements.** Describe the environmental characteristics of the site(s) where the proposed activities will take place. Focus on site characteristics of concern—e.g., water supplies, animal habitat, steep slopes, etc. With regard to these critical characteristics, is the environmental situation at the site degrading, improving, or stable? In this section, also describe applicable host country environmental regulations, policies and practices.
- D. **Evaluation of Activities and Issues with Respect to Environmental Impact Potential.** Include impacts that could occur before construction starts, during construction and during operation, as well as any problems that might arise with abandoning, restoring or reusing the site at the end of the anticipated life of the facility or activity.

Explain direct, indirect, induced and cumulative effects on various components of the environment (e.g., air, water, geology, soils, vegetation, wildlife, aquatic resources, historic, archaeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc.)

- E. **Environmental Mitigation Actions (including monitoring).** Provide a workplan and schedule identifying the following:

Mitigation measures. Identify the means taken to avoid, reduce or compensate for impacts. (For example, restoration of borrow or quarry areas, replanting of vegetation, compensation for any relocation of homes and residents.) If standard mitigation or best practice guidance exists and is being followed, cite this guidance.

Monitoring Indicate how mitigation measures will be monitored to ensure that they accomplish their intended result. If some impacts are uncertain, describe the monitoring which will be conducted to identify and respond to these potential impacts.

Responsible parties. Identify *who* will undertake mitigation and who will conduct the monitoring, and at what frequency.

- F. **Other Information.** Where possible and as appropriate, include photos of the site and surroundings; maps; and list the names of any reference materials or individuals consulted.

(Pictures and maps of the site can substantially reduce the written description required in parts B & C)

Step 6. Based on the environmental review, reach a recommended determination for each high-risk or unknown/moderate-risk activity

For each high-risk or unknown/moderate-risk activity, the environmental review will help you decide between one of three recommended determinations:

- **no significant adverse impacts.** The activity in question will not result in significant, adverse environmental impacts. Special mitigation or monitoring is not required. Typically, this conclusion is not appropriate for high-risk activities.
- **no significant adverse impacts given specified mitigation and monitoring** With mitigation and monitoring as specified in the Environmental Review Report, the activities in question will not result in significant adverse environmental impacts.
- **significant adverse impacts.** The activities in question is likely to cause significant adverse environmental impacts and cannot be mitigated with best practices or other measures. A full environmental assessment will be required.

For each high-risk or unknown/moderate-risk activity, indicate your “recommended determination” in Section B of the form.)

Step 7: Summarize recommended determinations

In section C of the form, summarize your recommended determinations by checking ALL categories indicated in Table 1.

Step 8. Sign certifications (Section D of form)

Step 9. Submit form to USAID project officer. Attach Environmental Review Report, if any.

Program logo
here, if
desired

PROGRAM/PROJECT NAME

USAID/Mission or Bureau Name



Environmental Review Form for **XXX Program** Activities

Note: Follow, but do not submit, the attached instructions.

A. Applicant information

Organization	Parent grant or project
Individual contact and title	Address, phone & email (if available)
Proposed activity (brief description)	Amount of funding requested
Location of proposed activity	Start and end date of proposed activity

B. Activities, screening results, and recommended determination

Proposed activities (continue on additional page if necessary)	Screening result (Step 3 of instructions)			Recommended Determinations (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities)		
	Very Low Risk	High-Risk*	Moderate or unknown risk*	No significant adverse impact	With specified mitigation, no significant adverse impact.	Significant Adverse impact
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						

*These screening results require completion of an Environmental Review Report

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

The proposal contains. . .	(equivalent Regulation 216 terminology)
<input type="checkbox"/> Very low risk activities	<i>categorical exclusion(s)</i>
<input type="checkbox"/> After environmental review, activities determined to have no significant adverse impacts*	<i>negative determination(s)*</i>
<input type="checkbox"/> After environmental review, activities determined to have no significant adverse impacts, given specified mitigation and monitoring*	<i>negative determination(s) with conditions*</i>
<input type="checkbox"/> After environmental review, activities determined to have significant adverse impacts*	<i>positive determination(s)*</i>

*for these determinations, the form is not complete unless accompanied by Environmental Review Report

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 this Project:
 - Those responsible for implementing this activity have received training in environmental review AND training and/or documentation describing essential design elements and best practices for activities of this nature.
 - These design elements and best practices will be followed in implementing this activity.
 - Any specific mitigation or monitoring measures described in the Environmental Review Report 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) _____

(Print name) _____

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

BELOW THIS LINE FOR USAID USE ONLY**Clearance record**

USAID Project Officer	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			
USAID MEO	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			
USAID REO*	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			
USAID BEO*	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			

*REO & BEO approval required for all “high risk” screening results and for determinations of “significant adverse impacts”

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

Note to individuals adapting the:

*** Supplemental Environmental Review Form for NRM Activities
for use on a particular program/activity:**

- This supplement is oriented around major resource/issue clusters and asks “leading questions” about the actual potential for unintended harmful impacts, especially of CBNRM/ ecotourism activities.
- Underlined & blue highlighted text MUST be modified to reflect project and mission name
- Questions should be modified to respond to the needs of individual projects. This is intended to be a “living” document subject to adaptation.

DELETE THIS PAGE BEFORE MODIFYING/DISTRIBUTING THIS FORM



Supplement to the Environmental Review Form for Natural Resources Activities

Additional Screening Criteria for Natural Resource Activities under **XXX Program**

Purpose

This is a supplement to the “Instructions for environmental review of **XXX Program/Project** activities.” It is to be used for natural *resources-based activities*, including:

- Community-Based Natural Resource Management (CBNRM)
- Ecotourism
- Natural resources-based enterprise development with micro- and small enterprises

This supplement provides additional questions to ascertain whether these proposed activities should be categorized as “very low risk:”

- If the answers to ALL the questions that follow are “NO,” then the proposed natural resource-based activity is considered “very low risk.”
- If the answer to ANY question is “YES,” the activity CANNOT be considered “very low risk.”

Screening criteria

Will the activities...	YES	NO
Natural Resources		
Accelerate erosion by water or wind?		
Reduce soil fertility and/or permeability?		
Alter existing stream flow, reduce seasonal availability of water resources?		
Potentially contaminate surface water and groundwater supplies?		
Involve the extraction of renewable natural resources?		
Lead to unsustainable use of renewable natural resources such as forest products?		
Involve the extraction of non-renewable natural resources?		
Restrict customary access to natural resources?		
Reduce local air quality through generating dust, burning of wastes or using fossil fuels and other materials in improperly ventilated areas?		
Affect dry-season grazing areas and/or lead to restricted access to a common resource?		
Lead to unsustainable or unnecessarily high water extraction and/or wasteful use?		
Ecosystems and Biodiversity		
Drain wetlands, or be sited on floodplains?		
Harvest wetland plant materials or utilize sediments of bodies of water?		
Lead to the clearing of forestlands for agriculture, the over-harvesting of valuable forest species?		
Promote in-forest bee keeping?		
Lead to increased hunting, or the collection of animals or plant materials?		
Increase the risks to endangered or threatened species?		
Introduce new exotic species of plants or animals to the area?		
Lead to road construction or rehabilitation, or otherwise facilitate access to fragile areas (natural woodlands, wetlands, erosion-prone areas)?		

Will the activities...	YES	NO
Cause disruption of wildlife migratory routes?		
Agricultural and Forestry Production		
Have an impact on existing or traditional agricultural production systems by reducing seed availability or reallocating land for other purposes?		
Lead to forest plantation harvesting without replanting, the burning of pastureland, or a reduction in fallow periods?		
Affect existing food storage capacities by reducing food inventories or encouraging the incidence of pests?		
Affect domestic livestock by reducing grazing areas, or creating conditions where livestock disease problems could be exacerbated?		
Involve the use of insecticides, herbicides and/or other pesticides?		
Community and Social Issues		
Have a negative impact on potable water supplies?		
Encourage domestic animal migration through natural areas?		
Change the existing land tenure system?		
Have a negative impact on culturally important sites in the community?		
Increase in-migration to the area?		
Create conditions that lead to a reduction in community health standards?		
Lead to the generation of non-biodegradable waste?		
Involve the relocation of the local community?		
Potentially cause or aggravate land-use conflicts?		