

## **Annex C: Africa Bureau Environmental Compliance Forms**

This Annex contains templates and forms for use in preparing environmental documentation for Africa Bureau under USAID's procedures. (Note: forms used by other bureaus may differ.)

Note: when using these forms, replace headers and footers with ones which identify your organization and proposal.

These forms are available for download at [www.encapafrika.org](http://www.encapafrika.org).

### ***C.1 Africa Bureau IEE/CE Request Facesheet***

### ***C.2 Africa Bureau Request for Categorical Exclusion (Annotated outline)***

### ***C.3. Annotated IEE Outline***

### ***C.4 Environmental Status Report Facesheet (Title II activities)***

### ***C.5 Environmental Status Report Instructions and Format***



**FACESHEET**  
For INITIAL ENVIRONMENTAL EXAMINATION  
and/or  
REQUEST FOR CATEGORICAL EXCLUSION

**PROGRAM/ACTIVITY DATA:**

Program/Activity No:

Country/Region:

Program/Activity Title:

Funding Begin:

Funding End:

LOP Amount:

Sub-Activity Amount:

IEE Prepared by:

Current Date:

Is this an IEE/CE Amendment If "Yes," Filename & Date of Original IEE  
(Yes/No)?:

**ENVIRONMENTAL ACTION RECOMMENDED:** (Place X where applicable)

Categorical Exclusion:

Negative Determination: \*

Positive Determination:

Deferral:

**ADDITIONAL ELEMENTS:** (Place X where applicable)

CONDITIONS\* \_\_\_\_\_ PVO/NGO: \_\_\_\_\_

\*NOTE: negative determinations may include and be contingent upon mitigation and monitoring conditions specified in the IEE

**SUMMARY OF FINDINGS:**

(please limit to this page whenever possible, but at most three pages without clearances)

**APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:**

(Type name under signature line)

**CLEARANCE:**

Mission Director: \_\_\_\_\_ Date: \_\_\_\_\_

**CONCURRENCE:**

Bureau Environmental Officer: \_\_\_\_\_ Date: \_\_\_\_\_  
Brian Hirsch Approved: \_\_\_\_\_  
Disapproved: \_\_\_\_\_

**Filename:** \_\_\_\_\_(USAID/AFR BEO)

**ADDITIONAL CLEARANCES:** (Add as appropriate; type name under signature line)

Mission Environmental Officer: \_\_\_\_\_ Date: \_\_\_\_\_

Activity Manager: \_\_\_\_\_ Date: \_\_\_\_\_  
(Cognizant Technical Officer, etc.)

SO Team Leader: \_\_\_\_\_ Date: \_\_\_\_\_

Regional Environmental Officer  
(RCSA, REDSO, WARP): \_\_\_\_\_ Date: \_\_\_\_\_  
Rob Clausen, Walter Knausenberger or Jean Saint-Cyr

Environmental Analyst &  
Policy Advisor (AFR/SD): \_\_\_\_\_ Date: \_\_\_\_\_

**OPTIONAL CLEARANCES:**

General Counsel  
(Africa Bureau): \_\_\_\_\_ Date: \_\_\_\_\_

Regional Legal Advisor: \_\_\_\_\_ Date: \_\_\_\_\_

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## **C.2 Annotated outline: Request for Categorical Exclusion**

Must be submitted with “FACESHEET For INITIAL ENVIRONMENTAL EXAMINATION and/or REQUEST FOR CATEGORICAL EXCLUSION.” (See Annex C.1, immediately above.)

Use headings exactly as given below. The request for Categorical exclusion should normally not exceed 1-2 pages. Form is available for download from [www.encapafrika.org](http://www.encapafrika.org).

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# **Request for Categorical Exclusion**

## **PROGRAM/ACTIVITY DATA:**

**Program/Activity No:**

**Country/Region:**

**SO# and Program/Activity Title:**

## **1. BACKGROUND AND ACTIVITY DESCRIPTION**

Provide More in-depth information than what was provided on the cover sheet, especially if activities are relatively diverse, complex, and likely to operate for several years. This will allow the environmental recommendation to be more self-explanatory and free-standing, especially for the BEO’s record keeping and tracking purposes.

Continue on an additional page if necessary

## **2. JUSTIFICATION FOR CATEGORICAL EXCLUSION REQUEST**

Cite appropriate language from Reg. 216, especially 22 CFR 216.2(c). Where necessary, make the case for its application to the activities described above.

Continue on an additional page if necessary

Here is an example citation:

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”The items described justify Categorical Exclusions, pursuant to 22 CFR §216.2(c)(1) and (2), for

which an Initial Environmental Examination, or an Environmental Assessment are not required because the actions do not have an effect on the natural or physical environment.

SO 8 interventions, as currently planned, fall into the following classes of action:

- (a) education, technical assistance and training (216.2(c)(2)(i));
- (b) analyses, studies, and workshops (216.2(c)(2)(iii));
- (c) document and information transfer (216.2(c)(2)(v)); and
- (d) activities that will develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)). As currently planned, no interventions will directly affect the environment.

If during implementation, activities are considered under SO 8 that are outside the above framework, activities other than those described in the subject categorical exclusions, and that may directly affect the environment (such as construction or rehabilitation of facilities), an IEE or amended Request for a Categorical Exclusion shall be submitted, as appropriate.

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## **C.3 Annotated Initial Environmental Examination (IEE) Outline**

### **Program/Activity Data**

<b>For Title II DRP IEEs</b>	<b>For non-Title II IEEs</b>
DRP Program/Activity:	Program/Activity Number:
CS Name, Country/Region:	Country/Region:
	Program/Activity Title:

### **1. Background and activity/program description**

#### **1.1 Purpose and Scope of IEE**

What does the IEE cover, why is it needed, is it an amendment, and if so, why? What other IEEs cover the sector, or SO, if any? .

#### **1.2 Background**

Describe why the activity is desired and appropriate, with some relevant context..

#### **1.3 Description of Activities**

Outline the key activities proposed for funding. A current activity description should be provided, paraphrasing and shortening as much as needed. Some suggested subheadings:

1.2.1 Results Framework

1.2.2 So Activities Results Framework

### **2. Country and environmental information (baseline information)**

**Recommended subheadings:**

#### **2.1 Locations Affected**

#### **2.2 National [or applicable] Environmental Policies and Procedures**

[of the host country, and including policies both for environmental assessment and development or other policies pertaining to the sector]

Section 2 is critical and should briefly assess the current physical environment that might be affected by the activity. It should draw on the Country Strategy and supportive analysis (such as the Environmental Threats and Opportunities Assessment, Conflict Vulnerability Assessment, etc.).

While we are seeking to streamline IEEs, we also need to try to maintain the integrity of relevant analysis that sheds light on the interventions in the SO. This may be a standard we cannot always meet.

Our objective should be to add analysis which has a bearing upon the substance of the sector involved, we don't want irrelevant "fill" material in here. Ideally some thoughtful analysis should be there, or at least compact, up-to-date, relevant info to the sector, e.g., on the environment-conflict links. It is worth drawing attention, in the IEE (which seeks to ensure that we avoid harm, in the most basic biophysical sense), to the SO's opportunities for improving environmental management and governance.

Depending upon the activities proposed, this could include an examination of land use, geology, topography, soil, climate, groundwater resources, surface water resources, terrestrial communities, aquatic communities, environmentally sensitive areas (e.g., wetlands or protected species), agricultural cropping patterns and practices, infrastructure and transport services, air quality, demography (including population trends/projections), cultural resources, and the social and economic characteristics of the target communities.

The information obtained through this process should serve as an environmental baseline for future environmental monitoring and evaluation. Be selective in the country and environmental information you provide, as it should be specific to the activity being proposed and more information is not necessarily better.

Finally, indicate the status and applicability of host country, Mission, and CS policies, programs and procedures in addressing natural resources, the environment, food security, and other related issues.

*Cross-referencing.* One approach which might be an appropriate expedient is to refer to an earlier IEE's write-up for this Section, as long as it is in the same strategy period, and reasonably recent and relevant (say, less than 3-5 years old). If one were to use this approach, here's how it should be done, so the file can be found online: "See IEE for SO1 -- Increased rule of law and transparency in governance, 27rwand4.iee, at <http://www.afr-sd.org/documents/iee/docs/27rwand4.doc>. "

The BEO Actions Tracker is a reliable resource, typically kept current within at least six months.

### **3. Evaluation of environmental impact potential**

This section of the IEE is intended to define all potential environmental impacts of the activity or project, whether they be considered direct, indirect, beneficial, undesired, short-term, long-term, or cumulative.

### **4. Recommended threshold decisions and mitigation actions (including monitoring and evaluation)**

4.1 Recommended Threshold Decisions and Conditions

4.2 Mitigation, Monitoring and Evaluation

#### **FOR AN UMBRELLA IEE (see Annex G), THE FOLLOWING MIGHT BE USED:**

4.1 Recommended Threshold Decisions and Conditions

4.2 Recommended Planning Approach

4.3 Environmental Screening and Review Process

4.3 Promotion of Environmental Review and Capacity Building Procedures

4.4 Environmental Responsibilities

4.5 Mitigation, Monitoring, and Evaluation

For each proposed activity or major component recommend whether a specific intervention included in the activity should receive a categorical exclusion, negative determination (with or without conditions), positive determination, etc., as well as cite which sections of Reg. 216 support the requested determinations.

Recommend what is to be done to avoid, minimize, eliminate or compensate for environmental impacts. For activities where there are expected environmental consequences, appropriate environmental monitoring and impact indicators should be incorporated in the activity's monitoring and evaluation plan.

**TITLE II ENVIRONMENTAL STATUS REPORT FACESHEET**

**Title of Activity:** \_\_\_\_\_

**CS name** \_\_\_\_\_

**Country/Region:** \_\_\_\_\_

**Funding Period:** FY\_\_\_\_\_ - FY\_\_\_\_\_

**Resource Levels:**

Commodities (dollar equivalent, incl. monetization): \_\_\_\_\_

Total metric tonnage request: \_\_\_\_\_

**Status Report Prepared by:**

Name: \_\_\_\_\_ Title \_\_\_\_\_

Date: \_\_\_\_\_

**Date of Previous Status Report:** \_\_\_\_\_

**A. Status of the environmental documentation**

Type of original documentation (circle one)	Categorical exclusion request	IEE	EA/PEA
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Date of most recent documentation: \_\_\_\_\_

\_\_\_\_\_ No revisions or modifications needed. Documentation for all activities still applicable.

\_\_\_\_\_ Amended documentation submitted, based on attached report, summary, etc.

\_\_\_\_\_ Documentation needs to be amended to cover additional or modified activities. [Note: If yes, immediately notify the MEO, REO (where one exists) or the BHR BEO.]

**B. Status of Fulfilling Conditions in the IEE, including Mitigation Measures and Monitoring**

\_\_\_\_\_ Environmental Status Report describing compliance measures taken is attached.

\_\_\_\_\_ For any condition that cannot be satisfied, a course of remedial action has been provided within an IEE Amendment. [Note: For conditions under an EA or PEA, consult the MEO, REO (where one exists) and/or BEO].

**USAID APPROVAL OF ENVIRONMENTAL STATUS REPORT:**

**Clearance:**

Mission Environmental Officer:\* \_\_\_\_\_ Date: \_\_\_\_\_

Food For Peace Officer: \_\_\_\_\_ Date: \_\_\_\_\_

\*or USAID Environmental Representative, if MEO does not exist.



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## ***C.5 Environmental Status Report Instructions and Format***

In 2-10 pages or less, the Environmental Status Report should indicate whether steps need to be taken to amend previous environmental documentation and whether conditions are being met, e.g., mitigation plans are on schedule and the monitoring and evaluation measures are being undertaken by the Cooperating Sponsor. In a Mission's PAA comments and/or approval cable to BHR/FFP, the Mission should state whether it concurs with the Environmental Status Report.

### **Section A. Status of the IEE/Categorical Exclusion/EA or PEA**

Use the answers to the following questions to determine if the status of the IEE has changed.

Use the same instructions for a Categorical Exclusion submission in the event all CS activities were Categorical Exclusions.

If any activities are covered under an EA which is typically activity or site-specific—or a broader sectoral, thematic or geographic PEA—the questions below need to be interpreted in the context of the specific activity, sector or area.

#### **A1. Modified or New Activities:**

Have new activities been added or activities substantially modified?

If yes, note what these are and reference an amended IEE, if the DAP or PAA has an approved IEE. Reference a Categorical Exclusion Document in the event the DAP or PAA required only a Categorical Exclusion Document **and** the new/modified activities are also categorically excluded. If they are not, a full IEE will need to be prepared.

Note: An amended DAP requires an IEE Amendment. Also remember that activities can be changed or added that do not require an amended DAP, but which do alter Reg. 216 threshold decisions and would require an IEE Amendment.

#### **A2. Resolution of Deferrals:**

Did the previous IEE have deferrals? List these.

State if they are being resolved through an amended IEE to be submitted with this year's PAA. If not, indicate when an amended IEE will be submitted in order to be able to go ahead with the activities.

If the deferred activities have been dropped from the sponsor's program, amend the current IEE to state that and recommend to the BEO that the deferral is no longer applicable.

#### **A3. Conditions:**

If experience has shown that conditions in the IEE cannot be complied with, note and reference an amended IEE, which discusses what substitute conditions are recommended in order to comply with the spirit of the original conditions (to avoid or reduce environmental effects).

Many conditions in IEEs relate to **Mitigation and Monitoring**. If based on Section B2 below, it proved not feasible to carry out all mitigation and monitoring and the sponsor desires to change the conditions for mitigation and monitoring spelled out in the IEE, discuss and reference an amended IEE.

**A4. Amendments:**

Based on the above, is an amended IEE needed?

Yes      If yes, attach here.      No

If the previous documentation was a Categorical Exclusion Submission, is an amended Categorical Exclusion needed to deal with new Categorical Exclusions for new activities?

Yes      If yes, attach here.      No       Not Applicable

Is the Sponsor unable to meet recommendations and/or conditions that are part of an EA or PEA or does the Sponsor believe an EA or PEA needs to be amended to cover additional or modified activities?

Yes      No       Not Applicable

If yes, immediately notify the MEO, REO (where available) or the BHR BEO.

**A5. Mission concurrence**

Remember it is necessary to obtain the Mission's concurrence on an Environmental Status Report prior to proposal approval. Be sure to complete the ESR Facesheet. Proceed to Section B.

**Section B. Status of Fulfilling Conditions in the IEE, including Mitigative Measures and Monitoring**

Take this opportunity to re-evaluate your mitigation and monitoring plan. Make sure the commitments made in the IEE are doable and realistic, in other words, not beyond the capabilities and resources of the CS to implement. Mitigation and monitoring can be part of normal visits to an area to check on activities, unless specific testing, surveys or the like have been required. Alternatively, experience to date may indicate that the IEE's mitigation and monitoring plan is not sufficiently specific or is lacking in some respect. If conditions or mitigation and monitoring are part of an activity-specific EA or sectoral PEA, the instructions below still apply.

**B1. List of conditions**

For each component of the program, list or reproduce (as an Annex to this report) the mitigation measures and monitoring or other conditions. [For activities placed under an umbrella process according to EDM Annex F, do not reproduce the standard Environmental Screening Form and Review conditions; follow instructions at B3 below.]

**B2. Compliance/implementation status**

Describe status of complying with the conditions. Examples of the types of questions a Sponsor should answer to describe "status" follow.

**Mitigation.**

- What mitigative measures have been put in place?
- How is the successfulness of mitigative measures being determined?
- If they are not working, why not? What adjustments need to be made?

**Monitoring**

## ENVIRONMENTAL PROCEDURES TRAINING MANUAL (AFR)

- What is being monitored, how frequently and where?
- What action is being taken (as needed) based on the results of the monitoring?

Note: In some situations, a CS will need to note that the monitoring program is still being developed with intent to satisfy the conditions.

Sponsors are encouraged to construct table(s) of relevant status indicators.

**For any conditions that cannot be satisfied, propose a course of remedial action and amend the IEE.** In the case of an EA or PEA, consult the MEO, REO (where available), and the BHR BEO, as amending an EA or PEA is a more elaborate process.

### ***B3. Environmental screening form activity***

If the CS is using Environmental Screening Forms (ESFs) and environmental reviews, prepare: i) a table listing the ESFs prepared and submitted; (ii) the Category(ies) the activity(ies) was/were placed in; and (iii) whether the ESF has been approved by the MEO. For any Category 2 or above activities, the chart should include the status of the Environmental Reviews, e.g., in preparation; submitted to MEO; approved by MEO; MEO referred to REO and BEO; and the date of approval by MEO or by REO or BEO, if appropriate.

## **Section C. Cooperating Sponsor Recommendations for Beyond Compliance and Institutionalization of Environmentally Sound Practices**

Please outline plans or recommendations (in a page or less) for institutionalizing environmentally sound design and management practices in future activities of a similar nature.

