

# Environmental Review Form (ERF) Packet

USAID Africa Bureau Version: 17 January 2005

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**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.

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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.*<sup>1</sup>

### 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.

<sup>1</sup> 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.

<p style="text-align: center;"><b>Very low-risk activities</b></p> <p>(Activities with low potential for adverse biophysical or health impacts; including §216.2(c)(2))</p>	<p style="text-align: center;"><b>High-risk activities</b></p> <p>(Activities with high potential for adverse biophysical or health impacts; including §216.2(d)(1))</p>
<p><b>Provision of education, technical assistance, or training.</b> (Note that activities directly affecting the environment do not qualify.)</p> <p><b>Community awareness</b> initiatives.</p> <p><b>Controlled agricultural experimentation</b> 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><b>Technical studies and analyses</b> and other information generation activities not involving intrusive sampling of endangered species or critical habitats.</p> <p><b>Document or information transfers.</b></p> <p><b>Nutrition, health care or family planning,</b> 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><b>Rehabilitation of water points</b> 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><b>NOTE:</b> USAID guidance on potable water requires water quality testing for arsenic, coliform, nitrates and nitrites.</p> <p><b>Small-scale construction.</b> 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><b>Intermediate credit.</b> Support for intermediate credit arrangements (when no significant biophysical environmental impact can reasonably be expected).</p> <p><b>Maternal and child feeding</b> conducted under Title II of Public Law 480.</p> <p><b>Title II Activities.</b> Food for development programs under Title III of P.L. 480, when no on-the-ground biophysical interventions are likely.</p> <p><b>Capacity for development.</b> 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><b>Small-scale Natural Resource Management activities</b> for which the answer to ALL SUPPLEMENTAL SCREENING QUESTIONS (see <i>Natural Resources supplement</i>) is “NO.”</p>	<p><b>River basin development</b></p> <p><b>New lands development</b></p> <p><b>Planned resettlement</b> of human populations</p> <p><b>Penetration road building, or rehabilitation</b> 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><b>Substantial piped water supply and sewerage</b> construction</p> <p><b>Major bore hole or water point construction</b></p> <p><b>Large-scale irrigation</b></p> <p><b>Water management structures</b> such as dams and impoundments</p> <p><b>Drainage of wetlands</b> or other permanently flooded areas</p> <p><b>Large-scale agricultural mechanization</b></p> <p><b>Agricultural land leveling</b></p> <p><b>Procurement or use of <u>restricted use</u> pesticides,</b> or wide-area application in non-emergency conditions under non-supervised conditions. (Consult MEO.)</p> <p><b>Light industrial plant production or processing</b> (e.g., sawmill operation, agro-industrial processing of forestry products, tanneries, cloth-dyeing operations).</p> <hr/> <p><b><u>High-risk and typically not funded by USAID:</u></b></p> <p><b>Actions affecting protected areas and species.</b> Actions determined likely to significantly degrade protected areas, such as introduction of exotic plants or animals</p> <p>Actions determined likely to jeopardize threatened &amp; endangered species or adversely modify their habitat (esp. wetlands, tropical forests)</p> <p><b>Activities in forests, including:</b></p> <ul style="list-style-type: none"> <li>▪ <b>Conversion of forest lands</b> to rearing of livestock</li> <li>▪ <b>Planned colonization of forest lands</b></li> <li>▪ <b>Procurement or use of timber harvesting equipment</b></li> <li>▪ <b>Commercial extractin of tiber</b></li> <li>▪ <b>Construction of dams</b> or other water control structures that flood relatively undegraded forest lands</li> <li>▪ <b>Construction, upgrading or maintenance of roads</b> that pass through relatively non-degraded forest lands. (Includes temporary haul roads for logging or other extractive industries)</li> </ul>

(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.

<b>Common examples of moderate-risk activities</b>	
<p><b>CAUTION:</b> 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>	
<p><b>Small-scale agriculture, NRM, sanitation, etc.</b> (You may wish to define what “small scale” means for each activity)</p> <p><b>Agricultural experimentation.</b> Controlled and carefully monitored agricultural experimentation exclusively for the purpose of research and field evaluation of MORE than 4 ha.</p> <p><b>NOTE Biotechnology/GMOs:</b> 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><b>Medium-scale construction.</b> 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><b>Rural roads.</b> Construction or rehabilitation of rural roads meeting the following criteria:</p> <ul style="list-style-type: none"> <li>▪ Length of road work is less than ~10 km</li> <li>▪ No change in alignment or right of way</li> <li>▪ Ecologically sensitive areas are at least 100 m away from the road and not affected by construction or changes in drainage.</li> <li>▪ No protected areas or relatively undegraded forest are within 5 km of the road.</li> </ul> <p><b>Title II &amp; III Small-Scale Infrastructure.</b> 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><b>Sampling.</b> Technical studies and analyses or similar activities that could involve intrusive sampling, of endangered species or critical habitats. (Includes aerial sampling.)</p> <p><b>Water provision/storage.</b> 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><b>NOTE:</b> USAID guidance on water quality requires testing for arsenic, nitrates, nitrites and coliform bacteria.</p> <p><b>Support for intermediate credit institutions</b> when indirect environmental harm conceivably could result.</p> <p><b>Institutional support grants to NGOs/PVOs</b> when the activities of the organizations are known and may reasonably have adverse environmental impact.</p> <p><b>Pesticides.</b> .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><b>NOTE:</b> 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><b>Nutrition, health care or family planning,</b> 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)**

<b>The proposal contains. . .</b>	<i>(equivalent Regulation 216 terminology)</i>
<input type="checkbox"/> Very low risk activities	<i>categorical exclusion(s)</i>
<input type="checkbox"/> After environmental review, activities determined to have <b>no significant adverse impacts*</b>	<i>negative determination(s)*</i>
<input type="checkbox"/> After environmental review, activities determined to have <b>no significant adverse impacts, given specified mitigation and monitoring*</b>	<i>negative determination(s) with conditions*</i>
<input type="checkbox"/> After environmental review, activities determined to have <b>significant adverse impacts*</b>	<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 <input type="checkbox"/> Clearance given <input type="checkbox"/> Clearance denied	(print name)	(signature)	(date)
USAID MEO <input type="checkbox"/> Clearance given <input type="checkbox"/> Clearance denied	(print name)	(signature)	(date)
USAID REO* <input type="checkbox"/> Clearance given <input type="checkbox"/> Clearance denied	(print name)	(signature)	(date)
USAID BEO* <input type="checkbox"/> Clearance given <input type="checkbox"/> Clearance denied	(print name)	(signature)	(date)

\*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.

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# 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
<b>Natural Resources</b>		
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?		
<b>Ecosystems and Biodiversity</b>		
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?		
<b>Agricultural and Forestry Production</b>		
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?		
<b>Community and Social Issues</b>		
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?		