

*Annotated Template for Global/Cross-Bureau IEEs/  
RCEs File Number/Document Control Number (DCN): **Asia 19-038***

**US Agency for International Development (USAID) / Bangladesh  
Initial Environmental Examination (IEE) Face-sheet**

**Project Data:**

Activity Titles: <b>1. Esho Shikhi (“Come and Learn”) Activity</b> <b>2. Shobai Miley Pori (“Everyone Reads Together”) Activity</b>		Solicitation N/A
Contract/Award Number (if known): N/A		
Geographic Location : <b>Bangladesh/Asia; 388</b>		
Originating Bureau/Office: <b>Asia Bureau</b>		
Supplemental IEE: <b>No</b> Amendment: <b>No</b> Programmatic IEE: <b>NO</b>	DCN and date of Original document:	
	DCN and Environmental Compliance Database link(s) of Amendment(s):	
	Amendment No.: N/A	
Funding Amount: <b>1. Esho Shikhi: \$39.5 million (estimated)</b> <b>2. Shobai Miley Pori: \$35 million (estimated)</b>	Life of Project Amount: \$74.5 million (combined)	
Implementation Start/End: March 2020 – February 2025		
Prepared By: Kate Maloney	Date Prepared: <b>April 17, 2019</b>	
Expiration Date (if any): FY 2025	Reporting due dates (if any): frequency as stipulated in the contract or award	
Environmental Media and/or Human Health Potentially Impacted (check all that apply): <b>Water      Land      Human Health</b>		
<b>Recommended Threshold Determination:</b> <ul style="list-style-type: none"> <li>● <b>Negative Determination with conditions</b></li> <li>● <b>Categorical Exclusion</b></li> </ul>		

**Climate Change Adaptation/Mitigation Measures:** Recent USAID supported numerous analysis of climate risks, including in the education sector, found that interventions in the sector to be no to low (low-moderate) risk and of high risk when construction, rehabilitation or renovation of educational facilities is involved.<sup>1</sup> Further climate risk screening shall be conducted by the implementing partner at the activity level for those activities under the approved Negative Determination with Conditions Threshold Decision. USIAD/Bangladesh is preparing the Second Wave Country Development Cooperation Strategy, for which the Foreign Assistance Act 118/119 and climate risks and vulnerability analysis having been drafted and are under the review in the Mission. When these analyses are approved by the Mission and the Asia Bureau Climate Integration Lead and Environmental Officer, these will further guide climate risk screening at activity level.

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<sup>1</sup> FRAGILITY AND CLIMATE RISKS IN BANGLADESH at: [https://pdf.usaid.gov/pdf\\_docs/PA00TBFJ.pdf](https://pdf.usaid.gov/pdf_docs/PA00TBFJ.pdf), USAID/BANGLADESH COMPREHENSIVE RISK AND RESILIENCE ASSESSMENT at: [https://www.usaid.gov/sites/default/files/documents/1861/BNG\\_resilience\\_assessment\\_report\\_4Apr2017\\_final.pdf](https://www.usaid.gov/sites/default/files/documents/1861/BNG_resilience_assessment_report_4Apr2017_final.pdf), CLIMATE RISK PROFILE BANGLADESH at: [https://reliefweb.int/sites/reliefweb.int/files/resources/2018-02-Mar\\_CadmusCISF\\_Climate-Risk-Profile-Bangladesh.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/2018-02-Mar_CadmusCISF_Climate-Risk-Profile-Bangladesh.pdf), Climate Change Information Fact Sheet BANGLADESH at: [https://www.climatelinks.org/sites/default/files/asset/document/Bangladesh%20Climate%20Info%20Fact%20Sheet\\_FINAL.pdf](https://www.climatelinks.org/sites/default/files/asset/document/Bangladesh%20Climate%20Info%20Fact%20Sheet_FINAL.pdf), FAA 118/119 at: <https://www.usaid.gov/sites/default/files/documents/1865/Bangladesh-Tropical-Forests-and-Biodiversity-Assessment-2016.pdf>, Climate Change and Education at: [https://www.unisdr.org/files/16355\\_climatechangeedbangladesh.pdf](https://www.unisdr.org/files/16355_climatechangeedbangladesh.pdf), CLIMATE CHANGE AND COASTAL ZONES AN ANNEX TO THE USAID CLIMATE-RESILIENT DEVELOPMENT FRAMEWORK at: <http://www.adaptationlearning.net/sites/default/files/resource-files/Coastal-Marine-Annex.pdf>, [http://sdwebx.worldbank.org/climateportal/countryprofile/doc/GFDRRCountryProfiles/wb\\_gfdr climate\\_change\\_country\\_profile\\_for\\_BGD.pdf](http://sdwebx.worldbank.org/climateportal/countryprofile/doc/GFDRRCountryProfiles/wb_gfdr climate_change_country_profile_for_BGD.pdf)

## **1.0 BACKGROUND**

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

In accordance with 22 CFR 216, this Initial Environmental Examination provides a preliminary review of the reasonably foreseeable effects on the environment as well as recommended Threshold Decisions for two new education activities at USAID/Bangladesh.

### **1.2 Description of Activities**

USAID partners with the Government of Bangladesh in the education sector to achieve the shared goal of improving learning outcomes for children in the early grades. Through these two planned education activities, USAID will respond to the needs of marginalized children in crisis in Cox's Bazar and the needs of children with disabilities.

#### **1.2.1 Esho Shikhi (“Come and Learn”)**

The \$39.5 million Esho Shikhi (“Come and Learn”) Activity aims to improve the learning outcomes of Bangladeshi primary-aged students affected by the Rohingya crisis in Cox's Bazar district. The result areas are: 1) learning opportunities increased; 2) quality of education in selected subjects improved; 3) district, sub-district, and community capacity to plan, manage, and oversee quality education increased to ensure self-reliance; and 4) school communities can mitigate or manage the effects of shocks and stressors on education. It is anticipated that the activity will be implemented in all 824 primary schools in the district.

Illustrative activity interventions include:

- Needs-based improvements, renovation, and refurbishment of schools, including: installing ramps for accessibility, enhancing lighting and ventilation, small building repairs, gender-segregated and disability-friendly water, sanitation, and hygiene facilities, and boundary walls.
- Teacher training, provision of teaching and learning materials, and student assessments.
- Assessments of school community needs and assets.
- Embedding staff in district offices, training district leaders, and holding workshops to develop district education plans.
- Workshops with parents and community members to support their engagement in children's learning.
- School-wide and community-linked disaster simulation drills.
- Development of school-level disaster management plans.

- Teacher professional development on Education in Emergencies and Disaster Risk Response.

### **1.2.2 Shobai Miley Pori (“Everyone Reads Together”)**

The \$35 million Shobai Miley Pori (“Everyone Reads Together”) Activity aims to improve early grade reading outcomes in Bangla for children with disabilities in Government Primary Schools. To accomplish this objective, the activity will strengthen government service delivery of disability-inclusive education and create inclusive school environments and instruction for children with disabilities.

Illustrative activity interventions include:

- Needs-based improvements, renovation, and refurbishment to make schools accessible for children with disabilities, including: installing ramps for accessibility, enhancing lighting and ventilation, small building repairs, and gender-segregated and disability-friendly water, sanitation, and hygiene (WASH) facilities.
- Research on education opportunities and resources for children with disabilities.
- Teacher training, development of teaching and learning materials, and student assessments.
- Embedding staff in ministry offices, training district leaders, and holding workshops to develop district education plans.
- Workshops with parents and community members to support their engagement in children’s learning.

## **2.0 COUNTRY AND ENVIRONMENTAL INFORMATION**

### *Education*

Bangladesh has made notable progress in expanding access to education, but the quality of education remains low. Bangladesh’s trajectory towards becoming a middle-income country depends on having a skilled workforce, but low levels of basic education, particularly literacy, are a persistent binding constraint for key industries. This skills gap starts in the early grades, where children are not acquiring the foundational skill of reading. A USAID-funded assessment in March 2018 found that 44% of students finish first grade unable to read their first word in the Bangla language, and 63% of second graders cannot read with comprehension. For marginalized groups, access to quality education continues to be a challenge. One of the largest out-of-school populations in Bangladesh is children with disabilities. In 2017, only 75,021 children with disabilities attended primary school, which is significantly lower than the rates of national and international estimates for the prevalence of disability.

For children in Cox’s Bazar and for children with disabilities, poor school infrastructure deters students from attending school. In a 2018 Rapid Education and Risk Analysis of schools in Cox’s Bazar, student focus groups frequently commented on their school’s inadequate sanitary

facilities. The lack of water and sanitary hygiene facilities is an especially critical obstacle for adolescent girls. In addition, for children with mobility impairments, the physical school environment presents limitations. For example, only 15% of schools have an access ramp, and only 1% of Government Primary Schools have accessible toilet facilities for children with mobility disabilities.

### *The Environment*

Located in South Asia, Bangladesh has a population of approximately 165 million people. It contains the second largest river basin in the world, including the confluence of three major rivers and their associated tributaries. Bangladesh has a marshy tropical coastline, large floodplains and low sea elevation, which create constant exposure to natural shocks and disasters<sup>2</sup>. The northeast and southeast portions of the country are hilly.

The natural ecosystems of Bangladesh include several types of forests, freshwater wetlands and coastal and marine types. Bangladesh features protected areas that have international status, such as the World Heritage site in the Sundarbans, and lesser known, but equally critical habitats like the haors (wetland basins) in northeastern Bangladesh and tropical evergreen forests in the Chittagong Hill Tracts. Although Bangladesh has a system of protected areas that includes national parks, wildlife sanctuaries and ecologically critical areas, enforcement of protections and protected area management is weak, resulting in severe degradation and loss of natural habitats and ecosystems. [The Tropical Forestry and Biodiversity Assessment \(FAA 118/119 Analysis: 2016\)](#)<sup>3</sup> commissioned by USAID/Bangladesh identified eight primary direct threats/challenges to the environment: 1) encroachment in protected areas; 2) degradation of forests and wetlands; 3) infrastructure development; 4) unsustainable and/or illegal exploitation of terrestrial resources; 5) unsustainable and/or illegal fishing practices; 6) change in hydrological regime; 7) pollution; and 8) invasive species.

The natural resources on which Bangladesh depends have been over-exploited and degraded.<sup>4</sup> The degradation of 66% of the country's precious wetlands, the continuing loss of natural forest cover, and the decrease of ecosystem productivity has seriously affected Bangladesh's efforts to ensure environmental sustainability.<sup>5</sup>

Bangladesh's water and agricultural resources (and, thus, its economic activities) and coastal infrastructure are particularly vulnerable to the threats of climate change. Saltwater intrusion threatens Bangladeshi freshwater resources; changing temperatures, precipitation, and sea level rise could reduce agricultural productivity; and sea level rise, storm surge, and extreme events could damage or destroy coastal infrastructure<sup>6,7</sup>.

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<sup>2</sup> "Bangladesh Climate Vulnerability Profile", USAID, January 2013. <https://goo.gl/ejAeHe>.

<sup>3</sup> FAA 118/119 is being amended as part of preparation of USAID/Bangladesh 2<sup>nd</sup> Wave CDCS.

<sup>4</sup> Bangladesh. Planning Commission. Environment, Forestry and Biodiversity Conservation: Background Paper for Seventh Five-Year Plan (2016-2020). <http://bit.ly/2igjj9F>.

<sup>5</sup> Bangladesh Tropical Forests and Biodiversity Assessment, USAID/Bangladesh, May 2016. <https://goo.gl/RjQ3cc>.

<sup>6</sup> Bangladesh CDCS Climate Change Risk Screening Desk Study, USAID/Bangladesh, March 2016.

<sup>7</sup> Climate Change Profile: BANGLADESH, the Dutch Sustainability Unit (DSU): Netherlands Commission for Environmental Assessment (NCEA), September 2016. <https://goo.gl/jq3rrE>.

The combination of geography, high population density, poor infrastructure, frequent natural hazards, and low resilience to economic and health shocks make Bangladesh especially vulnerable to climate risks and disasters with women, children, and people with disabilities suffering disproportionately<sup>8</sup>. The 2015 Climate Change Vulnerability Index, which evaluates the sensitivity of populations, the physical exposure of countries, and governmental capacity to adapt to climate change over the next 30 years, ranked Bangladesh as the country most at-risk of destabilization due to the effects of climate vulnerability.<sup>9</sup>

Healthy, well-functioning ecosystems such as forests, river basins, and mangroves can act as “natural structures” to reduce the magnitude of hazards and protect livelihoods<sup>10</sup>. Nonetheless, accelerating deforestation, forest degradation, and loss of biodiversity alter the ecological systems, biodiversity, genetic resources, and benefits derived with ecosystem services, thus impairing the ability of the ecosystems to serve as a safety net<sup>11</sup>. Changes in climate conditions caused by greenhouse gas emissions from deforestation, forest degradation, improper land use, and the combustion of fossil fuels exacerbate the shocks and stresses on ecosystems, making them more fragile.

The massive influx of Rohingya population is having a profound immediate impact on the ecosystem of Cox’s Bazar district. The district contains several ecologically critical areas and wildlife sanctuaries. Since August 2017, 500 hectares of forest has been lost per day at Cox’s Bazar south forest division<sup>12</sup>. At the current rate of firewood collection (700 tons/day), Cox’s Bazar District will lose its last remaining forests by the end of 2019<sup>13</sup>. A rapid assessment conducted by the United Nations Development Program identified 11 environmental impacts that have been or could potentially be exacerbated by the Rohingya influx<sup>14</sup>.

### **3.0 NATIONAL ENVIRONMENTAL POLICIES AND PROCEDURES**

Bangladesh has recognized environmental concerns for a long time, and there are more than 200 laws and by-laws exist to tackle these challenges related to environmental issues<sup>15</sup>. However, the majority of these laws were passed when Bangladesh faced a smaller population and different development conditions. Further, while Bangladesh has a strong legal and policy framework, the situation on the ground reflects a lack of capacity and coherent implementation by the government agencies, and a strong dependence on donor funding<sup>16</sup>.

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<sup>8</sup> Comprehensive Risk and Resilience Assessment, USAID/Bangladesh, September 2016. <https://goo.gl/Vjq7kx>.

<sup>9</sup> “Climate Change and Environmental Risk Atlas.” *Maplecroft*, 2015. <http://bit.ly/1u6qdi4>.

<sup>10</sup> “Resilience Overview.” International Union for the Conservation of Nature’s Commission on Ecosystem Management. Accessed on December 29, 2016. <https://goo.gl/dDiUPi>.

<sup>11</sup> Bangladesh Tropical Forests and Biodiversity Assessment, USAID/Bangladesh, May 2016. <https://goo.gl/RjQ3cc>.

<sup>12</sup> Jalal et al. (2018). Regional Site-Specific Plan for Landscape Restoration in and around the Refugee Camps in Cox’s Bazar South Forest Division.

<sup>13</sup> IOM & FAO (2017). Assessment of Fuel Wood Supply and Demand in Displacement Settings and Surrounding areas in Cox’s Bazar District.

<sup>14</sup> UNDP & MOEF. (2018). Rapid Environmental Impact Assessment on Rohingya Influx.

<sup>15</sup> Ibid

<sup>16</sup> Bangladesh Environment, Forestry and Climate Change Country Investment Plan [Second Draft], FAO, May 2016. <https://goo.gl/eTn14J>.

The first environmental policies were developed in the 1970s. Later, the National Environmental Policy (1992) and the National Environmental Management Plan (1995) focused on better management of scarce resources, reducing the rate of environmental degradation, improving the natural and manmade environment, conserving habitats and biodiversity, promoting sustainable development and improving quality indicators of human life.

The Bangladesh Environment Conservation Act, 1995 (amended in 2010) and the accompanying 1997 Rules are the pieces of legislation that provide legally binding direction for the protection and conservation of the environment, improvement of environmental standards, and control and mitigation of environmental pollution.

In 2000, Bangladesh also established environmental courts under the Environmental Court Act. Moreover, sectoral policies such as the National Water Policy (1999) and the Water Act (2013) regulate water resources, water quality, sanitation, fisheries and participation of local communities in water sector development.

The Forest Act of 1927 sets the framework for forest management and vests considerable power in the hands of the Chief Conservator of Forests to determine the use of forest lands and to penalize illegal users. While designating use rights in forests for villages, the act does not give a role to neighboring communities in any decision making, including minority communities that often had use and settlement rights in forest areas, or for civil society in general. The Bangladesh Wildlife (Preservation) Order of 1973 is mainly concerned with regulating hunting, but also sets out the scope for declaring protected areas as wildlife sanctuaries or national parks; notably, these are not limited to forests, nor is the Order limited to Forest Department implementation. New rules for the management of protected areas and for social forestry now under discussion.

The Protection and Conservation of Fish Act (1950) and the related Protection and Conservation of Fish Rules (1985), which cover not only fish but also amphibians and aquatic reptiles, prohibit fishing by harmful methods, pollution and other activities detrimental to fisheries, and enable the declaration of closed seasons and other rules. More recently, the Conservation, Restoration and Filling Control Act (2003) aims to address problems of siltation, encroachment and pollution of surface waters (rivers, canals, beels, floodplains) as well as aquifers.

Food safety is a concern in Bangladesh. The constitution implies food safety requirements for its citizens. The right to food is ensured under the “Provision of basic necessities” of the Constitution of People’s Republic of Bangladesh. Article 15 specifies that “it shall be a fundamental responsibility of the State to attain,...a constant increase of productive forces and a steady improvement...with a view to securing to its citizens the provision of the basic necessities of life, including food, clothing, shelter, education and medical care.” Furthermore, Article 18(1) of the constitution states that “the state shall raise the level of nutrition and improve public health as its primary duties.” In addition, the Bangladesh National Parliament passed the Food Safety Act on October 10, 2013.

The greatest threat to food safety is food adulteration. Major threats to food safety include: food adulteration, microbes contamination; residue of insecticides and pesticides, anti-biotics and growth hormones in poultry; presence of harmful additives, colors, toxic preservatives, and heavy metals in food.

The Government of Bangladesh recognizes that tackling climate change requires an integrated approach involving multiple ministries and agencies, civil society and the private sector. Under the leadership of the Ministry of Environment, Forest and Climate Change, the Government of Bangladesh prepared a National Adaptation Program of Action which was launched in 2005 and updated in 2009. The plan identifies priority activities to provide a response to urgent and immediate adaptation needs. Bangladesh was one of the first countries to introduce a climate change strategy and action plan. The Bangladesh Climate Change Strategy and Action Plan will run through 2018 and its revision is being planned. It was also one of the first to set up – using government resources – a fund to support climate change adaptation projects at local level (the Bangladesh Climate Change Trust Fund). The Government of Bangladesh appreciates that not only capacity building and disaster management but also institutional and infrastructure strengthening, development of research and low carbon technologies are of importance in addressing climate change.

Bangladesh is a party to all major environmental conventions, including the Convention on Biological Diversity, the Ramsar Convention on Wetlands of International Importance, the United Nations Framework Convention on Climate Change, and the Convention on the Conservation of Migratory Species. Bangladesh is up to date on the requirements of these conventions and submitted a 2015 update to for the Ramsar Convention, the Fifth Report to the Convention on Biological Diversity (2015), and an update on major sections of the Red Data Book is near completion<sup>17</sup>.

#### **4.0 ENVIRONMENTAL DETERMINATIONS**

##### **4.1 Categorical Exclusion per 22 CFR 216.2(c)(2)(i),(iii) and (v)**

A Categorical Exclusion is recommended for technical assistance and the implementation of proposed actions that do not have an effect on the natural or physical environment. In the Education Portfolio, the life-of activity value for these type of activities is:

- Esho Shikhi: \$38,000,000 (96%)
- Shobai Miley Pori: \$33,000,000 (94%)

Excluded activities may include the following:

- Education, technical assistance, and training [22 CFR 216.2(c)(2)(i)];
- Technical assistance, capacity building or training activities [22 CFR 216.2(c)(2)(i)];
- Information and experience sharing sessions [22 CFR 216.2(c)(2)(iii)];
- Studies required to support the activities [22 CFR 216.2(c)(2)(iii)];
- Analyses, investigations, reviews, assessments, restructuring and business plans, planning, studies (feasibility, monitoring, impact evaluation, and other social/technical

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<sup>17</sup> Bangladesh Tropical Forests and Biodiversity Assessment, USAID/Bangladesh, May 2016. <https://goo.gl/RjQ3cc>.

studies, etc.), surveys, mapping, workshops, seminars, conferences, meetings, enterprise resource planning, consultations, Geographic Information System mapping, policy and governance assistance [22 CFR 216.2(c)(2)(iii)];

- Preparation of environmental documentation, including environmentally required studies. [22 CFR 216.2(c)(2)(iii)];

#### **4.2 Negative Determination with Conditions per CFR 216.3(a)(2)(iii)**

A Negative Determination with Conditions is recommended for the following illustrative activities:

- School renovation, including: installing ramps for accessibility, enhancing lighting and ventilation, small building repairs, building gender-segregated and disability-friendly water, sanitation, and hygiene facilities, and building boundary walls.

These activities may have potentially minor to moderate adverse impacts on the physical and natural environment. The life-of activity value for these activities is not to exceed:

- Esho Shikhi (“Come and Learn”): \$1,500,000 (4% of life-of-activity value)
- Shobai Miley Pori (“Everyone Reads Together”): \$2,000,000 (6% of life-of-activity value)

These activities are recommended for a Negative Determination with Conditions per 22 CFR 216.3(a)(2)(iii), with the Threshold Decision Conditions being:

- a) In accordance with Agency policy on Construction Oversight Procedures, dated 12/10/2013, adequate USAID engineering oversight, including USAID engineer clearance on planning and design documentation, must be applied to rehabilitation and renovation activities. This oversight ensures environmentally sound design, specifications, materials, monitoring and evaluation, and best management practices in order to:
  - Minimize impact on the environment and social externalities (such as noise, garbage or waste disposal, aesthetic impacts, etc.) during the design, implementation, and life of the activities.
  - Minimize erosion, debris, and waste production, and ensure proper disposal of debris and waste.
- b) The implementing partner shall evaluate climate-related risks and vulnerabilities, using activity-level climate risk screening (see: <http://www.climatelinks.org>) and adjust activities, as appropriate, based on relevant analysis in accordance with the activity’s environmental manual (see Implementing Partner Requirements below).
- c) The implementing partner shall evaluate and integrate ecosystem services, as warranted, into planning, design, and implementation of site-specific activities.

Furthermore, the procurement of computer/electronic equipment under these activities to build organizational capacity and to support activity monitoring may have potentially minor to moderate adverse impacts on the physical and natural environment. Therefore, this component is recommended for **Negative Determination with Conditions** per 22 CFR 216.3(a)(2)(iii). The conditions are: procurement of equipment from certified and credible providers/retailers and return of the used/expired equipment to the original providers for an environmentally safe disposal in accordance with Government of Bangladesh requirements and/or under best international practice acceptable to USAID.

## **USAID Requirements, Including Resource Allocation, Training and Reporting Requirements**

- I. **Environmental Compliance Actions and Results in USAID Solicitations and Awards:** The independent government cost estimate (IGCE) must address and budget for the environmental compliance requirements and proposed conditions. The Contracting Officer shall include all conditions language and shall reference this IEE in appropriate solicitations and awards. The Mission Environment Officer/Climate Integration Lead and the Regional Environment Advisor/SCA & OAPA will advise, as warranted. Suggested boiler plate language for use in solicitation and awards can be found at the following link: <http://www.usaid.gov/ads/policy/200/204sac>.
- II. The COR and Mission Environmental Officer/Climate Integration Lead shall review and concur with statements of work or terms of reference for feasibility studies, assessments, Geographic Information Systems, etc. as warranted.
- III. **Implementing Partner Briefings on Environmental Compliance Responsibilities:** The Mission Environment Officer/Climate Integration Lead and the COR shall explain all applicable conditions to the implementing partner at the Post Award Conference.
- IV. **Compliance Monitoring:** as required by ADS 204.3.4, the USAID A/COR with assistance from the Mission Environment Officer/Climate Integration Lead and the Regional Environment Advisor/SCA & OAPA, as warranted, shall actively monitor and evaluate, by means of desktop reviews and site visits, whether there are new or unforeseen environmental and social consequences arising during implementation that were not identified and reviewed in accordance with 22 CFR 216 Compliance Reporting. A summary report of the Mission's compliance with this IEE will be sent to the Asia Bureau Environment Officer on an annual basis, normally in connection with the preparation of the Mission's annual environmental compliance report required under ADS 203.3.8.5 and 204.3.3. The Bureau Environment Officer (Asia) or Regional Environment Advisor may conduct site visits or request additional information for compliance monitoring purposes.
- V. It is the COR's responsibility to ensure that the implementing partner follows the environmental compliance requirements specified in this IEE.

## **Implementing Partner Requirements**

- I. **Environmental Impact Professional approved by the COR and Mission**

**Environment Officer/Climate Integration Lead:** Prior to the implementation of activities that received a negative determination with conditions in this IEE, the implementing partner shall recruit a qualified Environmental Impact Professional approved by the COR and the Mission Environment Officer/Climate Integration Lead. The Environmental Impact Professional will develop the environmental manual described below and other required environmental compliance documentation. The Environmental Impact Professional will recommend environmental actions to be taken by the activity, train activity personnel (including subcontractors), and coordinate implementation of mitigation measures, monitoring, and reporting. Illustrative terms of reference for an Environmental Impact Specialist are provided in Annex 1. Should the Environmental Impact Professional lack the special technical knowledge to identify any special environmental impact, the implementer will consult with a specialist in the relevant area.

- II. **Environmental Manual:** Prior to the implementation of activities that received a negative determination with conditions in this IEE, the implementer shall develop a practical, easy-to-use environmental manual, which should include: screening, selection and eligibility criteria, forms for climate risk screening, engineering verification, an environmental review checklist and review report, and a Framework Environmental Mitigation and Monitoring Plan. To prepare this environmental manual, the implementing partner will follow environmental guidelines for small-scale activities (available at: [www.usaidgems.org](http://www.usaidgems.org)<sup>18</sup>) and sample environmental manuals approved for other USAID/Bangladesh activities. Activities involving potable water supply shall ensure compliance with national quality standards; in the absence of national quality standards, the water supply should comply with World Health Organizations standards acceptable to USAID, particularly for arsenic.
- III. The implementing partner shall have sufficient technical and financial capabilities to implement the IEE and the environmental manual.
- IV. If, through the use of the environmental manual, an activity component is discovered to have potential significant adverse environmental impacts and social externalities, a Scoping Statement and Environmental Assessment shall be done by the implementer prior to start of activities. The scope of work for the Scoping Statement and Environmental Assessment Report must be reviewed by COR, Mission Environment Officer/Climate Integration Lead, Regional Environment Advisor/SCA & OAPA, and approved by the Asia Bureau Environment Officer. The Regional Environment Advisor/SCA & OAPA and the Asia Bureau Environment Officer will advise on the Environmental Assessment process as warranted.
- V. **Integration of the environmental manual into work plans and reporting:** The

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<sup>18</sup> The following additional references may help in the preparation of Environmental Manual (EM), EDFs and their Environmental Mitigation and Monitoring Plans (EMMPs).

- a) International Finance Corporation (IFC) Environmental, Health and Safety Guideline – <http://www.ifc.org/wps/wcm/connect/554e8d80488658e4b76af76a6515bb18/Final%2B-%2BGeneral%2BEHS%2BGuidelines.pdf?MOD=AJPERES>
- b) European Bank for Reconstruction and Development (ERBD) Sub-Sectoral Environmental and Social Guidelines at: <http://www.ebrd.com/about/policies/enviro/sectoral/>

implementing partner shall integrate the environmental manual into the activity work plan and budgets, implement the environmental manual, and report on its implementation through activity performance reporting. The implementing partner shall ensure that any subcontractors integrate implementation of IEE conditions, where applicable, into their own activity work plans and budgets and report on their implementation as an element of sub-contract or grant performance reporting.

- VI. **Assurance of Sub-contractor Capacity and Compliance:** The implementing partner shall ensure that subcontractors have the capability to implement the relevant requirements of this IEE and the environmental manual. The implementing partner shall, as and if appropriate, provide training to subcontractors in environmental compliance responsibilities and in environmentally sound design and management.
- VII. **New or Modified Activities:** As part of its initial work plan, and all annual work plans thereafter, the implementing partner, in collaboration with their COR, shall review all planned and ongoing activities to determine if they are within the scope of this IEE. If any activities are planned outside the scope of this IEE, an amendment to this IEE addressing these activities shall be prepared for USAID review and approval by the Mission and Asia Bureau Environment Officer. No such new activities shall be undertaken prior to formal approval of this amendment. Any ongoing activities found to be outside the scope of the approved IEE Threshold Decision shall be halted until an amendment to the IEE is submitted and written approval is received from USAID. This includes activities that were previously within the scope of the IEE, but were substantially modified in such a way that they move outside of the scope.
- VIII. **Compliance with Host Country Requirements and Ratified International Environmental Conventions:** Nothing in this IEE substitutes for or supersedes implementing partner and subcontractor responsibility for compliance with all applicable host country laws. The implementing partner and subcontractor must comply with all applicable host country environmental regulations unless otherwise directed in writing by USAID. However, in case of conflict between host country and USAID regulations, the latter shall govern. In all cases, implementation shall adhere to corresponding host country environmental laws and policies, generally outlined in the Bangladesh Environment Conservation Act, 1995 (amended in 2010) and the accompanying 1997 Rules; the National Environmental Policy of 1992, the National Environmental Management Action Plan of 1995 (and its 2000 and 2002 amendments), and the National Conservation Strategy of 1992.
- IX. **Compliance Monitoring and Reporting:** Implementing partners will report on environmental compliance requirements as part of their routine activity reporting to USAID. Monitoring will be conducted during the activity (beginning with a baseline) to determine the environmental impact (positive and/or negative) of all activity components. The implementer shall use only qualified staff for overseeing the mitigation and monitoring. Monitoring shall occur as defined in the annual plan, the environmental manual, and on an as-needed basis. The implementer will ensure that the environmental procedures are implemented, potential impacts mitigated, and indirect and cumulative effects are considered for each activity. If negative environmental impacts are discovered

through regular monitoring and evaluation, immediate actions will be taken to rectify the situation.

Mitigation and Monitoring reports will be submitted to the COR and the Mission Environment Officer/Climate Integration Lead prior to and upon completion of each relevant activity at every affected activity site, and not at the end of the activity nor on a semi-annual or annual basis. Reporting will include photographic documentation and site visit reports which fully document that all proposed mitigation procedures were followed throughout implementation.

The implementing partner’s performance reports to USAID shall contain a section specific to environmental compliance that includes activity summaries along with environmental impacts, success or failure of mitigation measures, results of environmental monitoring, and any major modifications/revisions to the activity, mitigation measures, or monitoring procedures. If the activities implemented do not have any negative impact on the environment, this should be documented as well.

## 5.0 SUMMARY TABLE

Activity	Effects on natural or physical environment	Total Estimated Cost	Recommended Threshold Determination
<b>Esho Shikhi (“Come and Learn”)</b>			
Distribution of teaching and learning materials; capacity building; community outreach; monitoring and evaluation	No adverse effect on the natural and/or physical environment	\$38,000,000 (96%)	<b>Categorical Exclusion</b> per 22 CFR 216.2(c)(2)(i) and (iii)
School renovation, including: installing ramps for accessibility, enhancing lighting and ventilation, small building repairs, gender-segregated and disability-friendly water, sanitation, and hygiene facilities, and boundary walls	Minor to moderate adverse effect on the natural and/or physical environment	\$1,500,000 (4%)	<b>Negative Determination with Conditions</b>
<b>Shobai Miley Pori (“Everyone Reads Together”)</b>			
Distribution of teaching and learning materials; capacity building; community outreach; monitoring and evaluation	No adverse effect on the natural and/or physical environment	\$33,000,000 (94%)	<b>Categorical Exclusion</b> per 22 CFR 216.2(c)(2)(i) and (iii)
School renovation,	Minor to moderate adverse	\$2,000,000 (6%)	<b>Negative Determination</b>

including: installing ramps for accessibility, enhancing lighting and ventilation, small building repairs, and gender-segregated and disability-friendly water, sanitation, and hygiene facilities	effect on the natural and/or physical environment		<b>with Conditions</b>
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## 6.0 CLIMATE RISK MANAGEMENT

In the revised ADS 201, dated January 23, 2017, Climate Risk Management is a required analysis for activities (201.3.4.5). The Mandatory Reference for ADS Chapter 201, Climate Risk Management for USAID Projects and Activities, dated October 12, 2016, outlines the process, and provides tools for so doing.

Recent USAID-supported analysis of climate risks found interventions in the education sector to be no to low (low-moderate) risk. In accordance with ADS 201, no further climate risk analysis is required at the activity level. Nonetheless, activities in construction, rehabilitation and renovation poses high climate risk. As a result, the implementing partner shall conduct additional climate risk screening at activity level for the school rehabilitation and renovation activities under the approved Negative Determination with Conditions Threshold Decision.

The activity accepts any climate risk over the implementation period and attempts to mitigate its effects by enhancing the absorptive, adaptive and transformative capacities of the target population to respond to these risks. Other risks, such as high population pressure on natural resources and political and other instability, may hinder achievement. These risks are mitigated through the activity’s requirement that implementers take a “Do No Harm” approach to ensure conflict sensitivity.

**Table 1. Climate Risk Matrix**

<b>Anticipated Activities</b>	<b>Climate Risks</b> <i>List key risks related to the activity elements identified through either the strategy or project-level climate risk assessment.</i>	<b>Risk Rating</b> Low   Moderate   High	<b>How risks are addressed at the activity level. If a decision has been made to accept the risk, briefly explain why.</b>
Esho Shikhi (“Come and Learn”)	The focus of the activity is to provide technical assistance to schools in Cox’s Bazar. The district is vulnerable to flooding, earthquakes, and cyclones. These environmental disasters could interrupt the continuity of education, damage activity materials, and damage	Moderate	The activity aims to improve community resilience in the face of these climate shocks by supporting community and parent organizations to develop continuity of education plans and to conduct disaster

	refurbishment projects.		preparedness drills.
Shobai Miley Pori (“Everyone Reads Together”)	This activity provides technical assistance to strengthen disability-inclusive education nationwide. Depending on the location of beneficiary districts, schools may be more or less vulnerable to natural hazards.	Low	This activity will not address these risks because the focus is on technical assistance to schools and government leaders. Potential risks will be addressed through climate risk screening at activity level.

## 7.0 Limitations of the IEE

This IEE covers all known or unknown activity components of the Esho Shikhi and Shobai Miley Pori activities through FY 2025 as long as the nature of the Esho Shikhi activities and life-of-activity budget remain as described in this IEE.

This IEE does not cover activities involving:

- Assistance, procurement, or use of pesticides and/or genetically engineered organisms;
- Development Credit Authority or Global Development Alliance programs;
- Procurement or use of asbestos, lead, mercury-containing materials, polychlorinated biphenyls or other toxic/hazardous materials prohibited by the U.S. Environmental Protection Agency, and/or under international environmental agreements and conventions; and
- Activities involving support to wood processing, agro-processing, industrial enterprises, and regulatory permitting.

Any of these actions would require mandatory analysis and an amendment to the IEE approved by the Asia Bureau Environment Officer.

## 8.0 Revisions

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that these education activities might have “major” and “significant” effect, or if additional activities are proposed that have not been assessed under this IEE that might be considered “major” and their effects significant, this categorical exclusion and negative determination will be reviewed and revised and submitted to the Asia Bureau Environmental Officer for approval and, if appropriate, an environmental assessment will be prepared. It is the responsibility of the USAID COR to keep the Mission Environmental Officer and the Bureau Environment Officer informed of any new information or changes in the activity that might require revision of this IEE.

## ANNEX 1

### TERMS OF REFERENCE / JOB DESCRIPTION

**POSITION TITLE:** Environmental Impact Specialist, [INSERT PROJECT NAME]

**LOCATION:** Dhaka, Bangladesh

**REPORTS TO:** [INSERT THE POSITION, CHIEF OF PARTY or OTHER]

**PERFORMANCE PERIOD:** [INSERT PERIOD, SPECIFY WHETHER IT IS A FULL OR PART TIME POSITION]

**ELIGIBILITY:** [US or LOCAL HIRE]

#### **PROGRAM SUMMARY:**

[INSERT PROGRAM ACTIVITY SUMMARY]

#### **POSITION SUMMARY:**

USAID policy requires implementing organizations to ensure their program activities do not have a negative impact on the environment. This is done primarily through detailed analyses of program activities to identify potential impacts, and the development and implementation of mitigation and monitoring measures to minimize and monitor these risks.

[PROJECT X] is required to follow environmental determinations specified in the USAID approved IEE [INSERT IEE DCN NUMBER], which outlines the activities with the potential for negative environmental impacts, and specifies actions to minimize the risk of these activities. The Environmental Impact Specialist will be responsible to ensure that the IEE requirements are implemented by the project team, including sub-contractors and grantees if applicable, and that all environmental impact analyses are completed as required by the IEE.

**ESSENTIAL RESPONSIBILITIES** [THIS IS AN ILLUSTRATIVE LIST, IT SHOULD BE COMPLETED BASED ON THE REQUIREMENTS OF THE IEE]:

- Work with program staff to implement the measures outlined in the [PROJECT X] IEE [INCLUDE ALL APPLICABLE], that includes develop, implement, monitor, report on, and update, as appropriate, the:
  - Environmental Due Diligence report (EDD)
  - Environmental Monitoring and Mitigation Plan (EMMP) and Environmental Manual (EM)
  - Pesticide Evaluation Report and Safe Use Action Plan (PERSUAP)
  - Scoping Statement (SS) and Environmental Assessment (EA)
- Ensure that all program activities consider potential environmental impact and address any environmental concerns;
- Conduct evaluation of potential environmental impacts in ...[e.g. construction], and ensure detailed engineering studies are completed for structures address environmental concerns;

- Coordinate as necessary with the GOB to process all documents required to obtain required environmental clearances and ensure compliance with relevant GOB environmental protection regulations;
- Work with the [PROJECT X] grant and contracts team to incorporate required environmental mitigation measures into grant and sub-contract documentation and project implementation;
- Assist [PROJECT X] staff in monitoring the implementation of [INSERT EMMP, PERSUAP or EA] during operation of the program, including regular visits to ...[agricultural, rehabilitation and/or construction sites];
- Report on the implementation of [EMMP, PERSUAP, EA] as part of program quarterly reports, and as otherwise appropriate;
- Ensure timely completion of all EMMP related deliverables and periodic reporting required by the EMMP;
- Develop training materials and provide training to and build the capacity of local implementing partners (including sub-contractors, grantees, community based organizations, project staff, and GOB counterparts, as necessary) on the requirements of the [EMMP, PERSUAP, EA] and national environmental regulations and how to comply with mitigation measures specified;
- Lead the inclusion of environmental compliance tasks, e.g. training, monitoring, reporting, updates, etc., in the annual implementation plan; and,
- Carry out other tasks as designated by COP.

#### **QUALIFICATIONS AND REQUIREMENTS:**

**Education:** Bachelor's degree in Environmental Science and/or Management or Environmental Engineering or related field. Master's degree preferred.

**Experience:**

- At least 5 years of experience working as environmental specialist, with a focus on regulatory compliance, environmental monitoring methods, impact analysis and assessment;
- Experience in conducting trainings;
- Experience in writing Environmental Impact Assessment(s) (EIA);
- Experience working in ...[e.g. parks or protected area infrastructure; conducting environmental assessments in the agriculture sector; and/or natural resource management];
- Knowledge of biological, water sciences, and/or the earth-sciences;
- Knowledge of Bangladesh environmental regulations required;
- Previous experience with donor funded projects preferred;
- Familiarity with USAID environmental guidelines is preferred

**Skills:**

- Proficiency with Microsoft Office;
- Should have strong analytical skills, be gender sensitive, and possess a proven track record of working successfully in a variety of cultural contexts;
- Excellent interpersonal and community consultation skills;
- Excellent writing skills;
- Fluent Bangla and English language skills [speak, read, write]

**Initial Environmental Examination (IEE) for USAID/Bangladesh Education Activities Esho Shikhi**

Initial Environmental Examination (IEE) for USAID/Bangladesh Education Activities Esho Shikhi and Shobai Miley Pori

Clearances:

PHNE Office Director: cleared Date: \_\_\_\_\_  
Caroll Vasquez

Mission Environmental Officer (A): [Signature] Date: April 17, 2019  
Emelda Mullick

Program Office Director: [Signature] Date: 4/18/19  
Todd Andrews

Regional Environmental Advisor: A. Barannik Date: 04-17-2019  
/SCA & OAPA Andrei Barannik  
RLO

Deputy Mission Director: [Signature] Date: 4/27/2019  
Zainah Salah cleared with comments.

Mission Director: [Signature] Date: 4/30/2019  
Derrick Brown

Concurrence: [Signature]  
Bureau Environmental Officer: [Signature] Date: May 1, 2019  
Will Gibson

Copied:  
Activity files  
MEO 22 CFR 216 Tracking  
OAA  
RLO