ENVIRONMENTAL COMPLIANCE FACESHEET & AMENDMENT #8 TO THE INITIAL ENVIRONMENTAL EXAMINATION (IEE)

Objectives: Objective 1) PS Peace and Security and Objective 2) DR Governing Justly and Democratically

Program Areas: PS. 1 Counter Terrorism; PS. 5 Transnational Crime; and PS. 6 Conflict Mitigation and Stabilization
DR. 1 Rule of Law ROL; DR. 6 Human Rights; DR. 2Good Governance; DR.3 Political Competition and Consensus Building; DR.4 Civil Society ; DR.5 Independent Media and Free Flow of Information

Program Elements: PS. 1.2 Countering Violent Extremism; PS. 5.1 Protection; PS.5.2 Prosecution; PS. 5.3 Prevention; PS.6.1 Conflict Early Warning, Mitigation and Peace Building; DR.1.1 Constitutions, Laws and Legal Systems; DR.1.2 Culture of Lawfulness; DR.1.3 Checks and Balances with Judicial Independence and Supremacy of Law; DR.1.4 Justice Systems and Institutions; DR.1.5 Fairness and Access to Justice; DR 6.1 Human Rights Systems, Policies and Protection; DR 6.2 Transitional Justice; DR. 6.3 Equal Rights for Marginalized Communities; DR.2.1 Legislative Authority - Function and Processes; DR 2.2 Non-security Executive Authority -Function and Processes; DR. 2.3 Local Government and Decentralization; DR. 2.4 Anti-Corruption Reforms; DR. 2.5 Executive Authority - Security Sector (Civilian); DR. 3.1 Consensus-Building Processes; DR. 3.2 Elections and Political Processes; DR. 3.3 Political Parties; DR 4.1 Enabling Environment for Civil Society; DR. 4.2 Civil Society Organizational Capacity Development; DR. 4.3 Civic Education, Citizen Participation and Public Accountability; DR. 4.4 Civic Education and Democratic Culture; DR. 4. 5 Democratic Labor and Trade Unions; DR. 5.1 Enabling Environment for Media and Free Flow of Information; DR. 5.2 Professional and Institutional Capacities of Media; DR. 5.3 Outlets and Infrastructure.

Country/Region: Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, and Uzbekistan

Funding Period: **LOP:** FY2018 – FY2025
Resource Levels/Amount(s): $200 M

Statement Prepared by: Irina Mitrofanova, Project Management Specialist, Democracy and Governance Office
Date: 5/29/2018

IEE Amendment? Yes☒ **No** ☐ **DCN of AMD 6 (Original P-IEE):** Asia 11-131[1]
DCN of AMD 7: Asia 14-68[2]

Environmental Media and/or Human Health Potentially Impacted (check all that apply):
None ☐ Air ☐ Water☒ Land ☒ Biodiversity ☐ Human health ☒Other ☐

[1] https://ecd.usaid.gov/document.php?doc_id=38207
[2] https://ecd.usaid.gov/document.php?doc_id=40226

Environmental Action(s) Recommended (check all that apply):

☒ ***Categorical Exclusion*(s)**

☒ ***Initial Environmental Examination:***

☒ ***Negative Determination***: no significant adverse effects expected regarding the proposed activities, which are well defined over life of activity. IEE prepared:

☒ With conditions: as established in the Programmatic IEE Amendment #6 (P-IEE)

SUMMARY OF FINDINGS

1.0 THE PURPOSE

The purpose of this Amendment #8 is to:

- Reflect on the extension of the LOP from 2020 to 2025;
- Timely and duly account for a new Uzbekistan Rule of Law (RoL-Uz) activity with an estimated value of $12 million; for a new Countering Violent Extremism Broad Agency Announcement **(**CVE BAA) activity with an estimated value of 4.5 million; and for any future Democracy and Governance (DG) activities in Central Asia (CA) and Kyrgyz Republic(KR) for a period of up to seven years (2018- 2025);
- Confirm that the scope, nature and type of proposed activities is consistent with those of regional and country-specific activities described in the Programmatic DG IEE Amendment 6, and stipulate that all previously approved Threshold Decisions and related conditions shall fully apply to new activities;
- Conduct first review of climate risk screening and management for RoL-Uz and CVE activities as required by the ADS 201mal and stipulate that prior to commencement of activities with approved Negative Determination with Conditions (NDC,) the implementing partner (IP) shall conduct climate risk screening (CRS) for all sectoral and sub-sectoral activities with the approved NDC (see: https://www.usaid.gov/ads/policy/200/201mal);
- Stipulate that projects/activities' CRS shall be presented in Environmental Review Checklist (ERC, see template in Annex 1) and appropriate commensurate mitigation and adaptation measures shall be developed and presented in integrated Environmental Mitigation and Monitoring plans (EMMP), as part of ERC. ERCs shall be reviewed and approved by the Mission Environmental Officer (MEO), Climate Integration Lead (CIL) and Contracting Officer Representative (A/COR);
- Stipulate that all approved Threshold Decisions and conditions are fully transposed into procurement instruments;
- Stipulate that at the post-award conference, the A/COR together with the MEO and CIL shall explain to the implementing partner the approved Threshold Decisions and conditions in force as provided in the IEE Amendment #6; and
- Stipulate that the approved limitations of the IEE and stipulation for revisions remain in force.

2.0 BACKGROUND AND NEW ACTIVITY DESCRIPTION

2.1 Uzbekistan Rule of Law

The proposed activity is closely aligned with USAID/Central Asia's Regional Development Cooperation Strategy (RDCS) and, in particular, with its Development Objective 3: "More effective and inclusive governance institutions that serve the public good." The intermediate results (IR) under this strategic objective pertaining to this program are IR 3.3: "More accountable and transparent state bodies", and IR 3.2: "More constructive engagement between representative civil society and governments". Across the region, the program supports the Foreign Assistance Framework, Objective: Governing Justly and Democratically in Program Area: Rule of Law. Specifically, the program addresses Program Element: Checks and balances with Judicial

Independence and Supremacy of Law. Further, this program will support the following U.S. priorities in Uzbekistan:

1. Increase citizen participation in governance through effective implementation of reforms and laws on civil society, government transparency and citizen oversight;
2. Foster independence of lawyers and judges in the justice system and improve public trust, transparency and administration of courts; and
3. Improve the enabling environment for civil society and citizen participation in governance.

Activities include:

Objective 1: Support for Rule of Law Development in Uzbekistan

- Provision of highly specialized technical expertise in development of Uzbekistan's legal and normative framework governing the justice system;
- Technical assistance in the incorporation of international best practices and international standards in draft law and policy;
- Support for development of legislative research materials, methodologies, and resources; and
- Support efforts of rule of law initiatives to work with the GOU on dispute resolution alternatives to courts such as mediation and/or arbitration.

Objective 2: Development of the Legal Profession

- Partnerships, exchanges, master classes, curriculum, research capacity for law schools and training academies;
- Training for judges, lawyers, prosecutors and defense on international standards, including adversarial proceedings, emphasizing Train the Trainer;
- Strategic planning workshops, development of work unit goals and planning documents;
- Skills training in organizational development and planning; and
- Integrate women's rights issues such as sex discrimination and violence against women into training programs for lawyers and judges.

Objective 3: Improve the CSO enabling environment

- Provision of highly specialized technical expertise in development of Uzbekistan's legal and normative framework governing civil society and NGOs
- Develop and disseminate information on new laws, regulations and procedures relevant to civil society and NGOs
- Small grants program to support CSO activities related to judicial reform, legal training, legal aid, and public control functions with some emphasis on regions outside Tashkent.

2.2 Countering Violent Extremism Broad Agency Announcement

2.2.1 Activities description

The CVE BAA awards will link to the National Security Strategy Objective #1 "Promoting America's Security at Home and Abroad". Two concept summaries have been considered under the CVE BAA. They include Proposed Research for Public Health Lens and Proposed Research for the Digital and Case Study Data. The activities are expected to take up to 18-24 months implementation period with budget of $4.5 million available for the BAA in Tajikistan, Uzbekistan, Kyrgyz Republic and possibly Kazakhstan. These activities will be procured in Washington and then will be transferred to USAID/CA.

Public Health Lens

This research initiative in Tajikistan and Kyrgyzstan will answer the following questions:
--to what extent is a public health approach to VE effective in identifying risk and prevention factors and interventions that reduce community risk to VE;
--to what extent do the community characteristics or factors differ in communities where VE has manifested and in communities with an absence of VE; and
--to what extent do community-level prevention strategies reduce community vulnerability to VE.

Proposed Research for the Digital and Case Study Data (Uzbekistan, Kyrgyzstan, and possibly Kazakhstan). The learning objectives of this activity are to gain a better understanding of community-level VE risk and resilience factors in Uzbekistan and Kyrgyzstan; and determine the extent to which digital drivers of risk and resilience are equal to, greater than, or less than real-world factors, particularly among youth. This activity may be implemented in Kazakhstan depending on the availability of funding.

2.3 Lessons Learned

During 2014-2017 Democracy and Governance activities were in full compliance with USAID requirements established in P-IEE amendments. A/ CORs and MEO visited multiple project sites and conducted environmental compliance monitoring of these activities. Practically all activities qualified for a Categorical Exclusion and didn't require environmental screening, mitigation, monitoring and reporting to USAID. In several cases limited amount of electric and electronic equipment was procured and small construction or renovation activities took place. This was reported in accordance with P-IEE conditions.

3.0 ENVIRONMENTAL COMPLIANCE SCREENING OF NEW ACTIVITIES

3.1 Environmental compliance screening.

Practically all components of the new activities fall under Categorical Exclusion and will not require further environmental review and reporting to USAID. Only if the project procures electric and electronic equipment and commodities, and/or works on small renovation/ reconstruction activities under various components, it will have to provide environmental management in accordance with terms established in P-IEE.

3.2 Climate risk screening.

All new activities components are rated as Low Climate Risk as they are not expected to materially affect the implementation or outcomes of the activity. Additional climate risk screening should be conducted for NDC activities by the IP (s) as required by ADS 201mal. The IP may use sources referenced in the Central Asia Climate Change Risk Profile at https://www.climatelinks.org.

3.3 Recommended Actions:

a)***Categorical Exclusion*** (more 95% of funding) **-** pursuant to 22 CFR 216.2(c)(2)(i), the originator of the activities has determined that Activities consist of types of interventions entirely within the categories listed in paragraph (c)(2), "Categorical Exclusions," of Section 216.2, "Applicability of Procedures," of Title 22 CFR Part 216, "AID Environmental Procedures", and therefore are categorically excluded from any further environmental review requirements. The originator of the proposed action has further determined that the proposed activities are fully within the following classes of actions:
-Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.) [22 CFR 216.2(c)(2)(i)];
-Analyses, studies, academic or research workshops and meetings [22 CFR216.2(c)(2)(iii)];
-Document and information transfers [22 CFR 216.2(c)(2)(v)];
-Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc. [22 CFR 216.2(c)(2)(xiv)]

b)***Negative Determination with Conditions*** (less than 5% of funding) is recommended for activities involving actions that directly, indirectly or cumulatively affect the physical or natural environments specified in Table 2, Sections II and III, IEE Amendment #6.

4.0 Revisions

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Program's effect "significant", this determination will be reviewed and revised by the originator of the project 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 A/COR to keep the USAID/CA mission, USAID/KR Mission and the

Clearance:

Regional Mission Director, USAID/ CA:	*Christopher W. Edwards*	Date: 6/8/18
A/Mission Director, USAID/KR:	*Kimberly Rozen*	Date: 6/6/18
Democracy and Governance Office Director, USAID/CA:	*Stephanie Garvey*	Date: 6/8/18
Democracy and Governance Office Director, USAID/CA:	*Cory Johnston*	Date: 6/6/2018
Regional Environmental Advisor for Central and South Asia & OAPA:	cleared *Andrei Barannik*	Date: 5/29/2018
Mission Environmental Officer, USAID/CA:	cleared *Nina Kavetskaya*	Date: 6/1/2018
Mission Environmental Officer, USAID/KR:	*Zaur Bostanov*	Date: 6/05/2018

Concurrence:

Asia Bureau Environmental Officer:	*William Gibson*	Date: June 11, 2018

Approved: __________

Disapproved: __________

Cced: Project files, MEO tracking, OAA

Annex 1

ENVIRONMENTAL REVIEW CHECKLIST FOR IDENTIFYING POTENTIAL ENVIRONMENTAL IMPACTS OF PROJECT ACTIVITIES AND PROCESSES

for [Activity Name]

Implemented under: [*Project Name*]

DCN: [*of Parent IEE*]

Prepared by: [*Implementer*]

ENVIRONMENTAL REVIEW CHECKLIST FOR IDENTIFYING POTENTIAL ENVIRONMENTAL IMPACTS OF PROJECT ACTIVITIES AND PROCESSES

The Environmental Review Checklist for Identifying Potential Environmental Impacts of Project Activities and Processes (ERC) is intended for use mainly by implementing partners to: assess activity-specific baseline conditions, including applicable environmental requirements; identify potential adverse environmental effects associated with planned activity(s) and processes; and develop environmental mitigation and monitoring plans (EMMPs) that can effectively avoid or adequately minimize the identified effects. This ERC can also be substituted for other ERC versions that may have been attached to project initial environmental examinations (IEE). If implementing partners are in doubt about whether a planned activity requires preparation of an ERC, they should contact their Contracting Officer's Representative (COR)/Agreement Officer's Representative (AOR) for clarification. *(When preparing the checklist, please indicate "not applicable" for items that have no bearing on the activity.)*

A. Activity and Site Information

Project Name: ***(as stated in the triggering IEE)***	
Mission/Country:	
DCN of Triggering IEE:	
Activity/Site Name:	
Type of Activity:	
Name of Reviewer and Summary of Professional Qualifications:	
Date of Review:	

B. Activity Description

1. Activity purpose and need
2. Location of activity
3. Beneficiaries, e.g., size of community, number of school children, etc.
4. Number of employees and annual revenue, if this is a business
5. Implementation timeframe and schedule
6. Detailed description of activity and site, e.g., size of the facility or hectares of land; steps that will be taken to accomplish the activity
7. Existing or planned certifications, e.g., ISO 14001 EMS, ISO 9000, HCCP, SA 8000, Global Gap, Environmental Product Declarations, Eco Flower, EcoLogo, Cradle to Cradle, UL Environment, GREENGUARD, Fair Trade, Green Seal, LEED, or various Forest Certifications
8. Site map, e.g., provide an image from Google Earth of the location
9. Photos of site *(when available)*

C. Activity-Specific Baseline Environmental Conditions

1. Population characteristics
2. Geography
3. Natural resources, e.g., nearby forest/protected areas, ground and surface water resources
4. Current land use
5. Proximity to public facilities, e.g. schools, hospitals, etc.
6. Other relevant description of current environmental conditions in proximity to the activity

D. Legal, Regulatory, and Permitting Requirements

1. National environmental impact assessment requirements for this activity

2. Applicable National or local permits for this activity, responsible party, and schedule for obtaining them:

Permit Type	Responsible party	Schedule
Zoning		
Building/Construction		
Source Material Extraction		
Waste Disposal		
Wastewater		
Storm Water Management		
Air Quality		
Water Use		
Historical or Cultural Preservation		
Wetlands or Water bodies		
Threatened or Endangered Species		
Other		

3. Additional national or other international environmental laws, conventions, standards with which the activity might be required to comply
   a. Air emission standards
   b. Water discharge standards
   c. Solid waste disposal or storage regulations
   d. Hazardous waste storage and disposal
   e. Historical or cultural preservation
   f. Other

E. Engineering Safety and Integrity *(for Sections E. and F., provide a discussion for any of the listed issues that are likely to have bearing on this activity)*

1. Will the activity be required to adhere to formal engineering designs/plans? Have these been or will they be developed by a qualified engineer?
2. Do designs/plans effectively and comprehensively address:
   a. Management of storm water runoff and its effects?
   b. Reuse, recycling, and disposal of construction debris and by-products?
   c. Energy efficiency and/or preference for renewable energy sources?
   d. Pollution prevention and cleaner production measures?
   e. Maximum reliance on green building or green land-use approaches?
   f. Emergency response planning?
   g. Mitigation or avoidance of occupational safety and health hazards?
   h. Environmental management of mobilization and de-mobilization?
   i. Capacity of the host country recipient organization to sustain the environmental management aspects of the activity after closure and handover?
3. Are there known geological hazards, e.g., faults, landslides, or unstable soil structure, which could affect the activity? If so, how will the project ensure structural integrity?
4. Will the site require grading, trenching, or excavation? Will the activity generate borrow pits? If so, how will these be managed during implementation and closure?
5. Will the activity cause interference with the current drainage systems or conditions? Will it increase the risk of flooding?

6. Will the activity interfere with above- or below-ground utility transmission lines, e.g., communications, water, sewer, or natural gas?
7. Will the activity potentially interfere with vehicle or pedestrian traffic?
8. Does the activity increase the risk of fire, explosion, or hazardous chemical releases?
9. Does the activity require disposal or retrofitting of polychlorinated biphenyl-containing equipment, e.g., transformers or florescent light ballasts?

F. Environment, Health, and Safety Consequences

1. Potential impacts to public health and well-being

a. Will the activity require temporary or permanent property land taking?
b. Will activities require temporary or permanent human resettlement?
c. Will area residents and/or workers be exposed to pesticides, fertilizer, or other toxic substances, e.g., as a result of farming or manufacturing? If so, how will the project:
    i. Ensure that these chemicals do not contaminate ground or surface water?
    ii. Ensure that workers use protective clothing and equipment to prevent exposure?
    iii. Control releases of these substances to air, water, and land?
    iv. Restrict access to the site to reduce the potential for human exposure?
d. Will the activity generate pesticide, chemical, or industrial wastes? Could these wastes potentially contaminate soil, groundwater or surface water?
e. Will chemical containers be stored at the site?
f. Does the activity remove asbestos-containing materials or use of building materials that may contain asbestos, formaldehyde, or other toxic materials? Can the project certify that building materials are non-toxic? If so, how will these wastes be disposed of?
g. Will the activity generate other solid or hazardous wastes such as construction debris, dry or wet cell batteries, florescent tubes, aerosol cans, paint, solvents, etc.? If so, how will this waste be disposed of?
h. Will the activity generate nontoxic, nonhazardous solid wastes (subsequently requiring land resources for disposal)?
i. Will the activity pose the need to handle and dispose of medical wastes? If so, describe measures of ensuring occupational and public health and safety, both onsite and offsite.
j. Does the activity provide a new source of drinking water for a community? If so, how will the project monitor water quality in accordance with health standards?
k. Will the activity potentially disturb soil contaminated with toxic or hazardous materials?
l. Will activities, e.g., construction, refurbishment, demolition, or blasting, result in increased noise or light pollution, which could adversely affect the natural or human environment?

2. Atmospheric and air quality impacts

a. Will the activity result in increased emission of air pollutants from a vent or as fugitive releases, e.g., soot, sulfur dioxide, oxides of nitrogen, volatile organic compounds, methane.
b. Will the activity involve burning of wood or biomass?

c. Will the activity install, operate, maintain, or decommission systems containing ozone depleting substances, e.g., freon or other refrigerants?
d. Will the activity generate an increase in carbon emissions?
e. Will the activity increase odor and/or noise?

3. Water quality changes and impacts

a. How far is the site located from the nearest river, stream, or lake?
b. Will the activity disturb wetland, lacustrine, or riparian areas?
c. What is the depth to groundwater at the site?
d. Will the activity result in increased ground or surface water extraction? If so, what are the volumes? Permit requirements?
e. Will the activity discharge domestic or industrial sewage to surface, ground water, or publicly-owned treatment facility?
f. Does the activity result in increased volumes of storm water run-off and/or is there potential for discharges of potentially contaminated (including suspended solids) storm water?
g. Will the activity result in the runoff of pesticides, fertilizers, or toxic chemicals into surface water or groundwater?
h. Will the activity result in discharge of livestock wastes such as manure or blood into surface water?
i. Does the site require excavation, placing of fill, or substrate removal (e.g., gravel) from a river, stream or lake?

4. Land use changes and impacts

a. Will the activity convert fallow land to agricultural land?
b. Will the activity convert forest land to agricultural land?
c. Will the activity convert agricultural land to commercial, industrial, or residential uses?
d. Will the activity require onsite storage of liquid fuels or hazardous materials in bulk quantities?
e. Will the activity result in natural resource extraction, e.g., granite, limestone, coal, lignite, oil, or gas?
f. Will the activity alter the viewshed of area residents or others?

5. Impacts to forestry, biodiversity, protected areas and endangered species

a. Is the site located adjacent to a protected area, national park, nature preserve, or wildlife refuge?
b. Is the site located in or near threatened or endangered (T&E) species habitat? Is there a plan for identifying T&E species during activity implementation? If T&E species are identified during implementation, is there a formal process for halting work, avoiding impacts, and notifying authorities?
c. Is the site located in a migratory bird flight or other animal migratory pathway?
d. Will the activity involve harvesting of non-timber forest products, e.g., mushrooms, medicinal and aromatic plants (MAPs), herbs, or woody debris?
e. Will the activity involve tree removal or logging? If so, please describe.

6. Historic or cultural resources

a. Are there cultural or historic sites located at or near the site? If so, what is the distance from these? What is the plan for avoiding disturbance or notifying authorities?
b. Are there unique ethnic or traditional cultures or values present in the site? If so, what is the applicable preservation plan?

G. Further Analysis of Recommended Actions *(if the applicable IEE requires the use of ERCs to perform further analysis of recommended actions, then check the appropriate box below. If this analysis is not required, then skip this and proceed with Section H. If required by the IEE, the ERC shall be copied to the Bureau Environmental Officer (BEO)).*

☐ **1. Categorical Exclusion:** The activity is not likely to have an effect on the natural or physical environment. No further environmental review is required.*

☐ **2. Negative Determination with Conditions:** The activity does not have potentially significant adverse environmental, health, or safety effects, but may contribute to minor impacts that can be eliminated or adequately minimized by appropriate mitigation measures. EMMPs shall be developed, approved by the Mission Environmental Officer (MEO) (and the BEO if required by the IEE) prior to beginning the activity, incorporated into workplans, and then implemented. See Sections H and I below.*

☐ **3. Positive Determination:** The activity has potentially significant adverse environmental effects and requires further analysis of alternatives, solicitation of stakeholder input, and incorporation of environmental considerations into activity design. A Scoping Statement must be prepared and be submitted to the BEO for approval. Following BEO approval an Environmental Assessment (EA) will be conducted. The activity may not be implemented until the BEO clears the final EA. For activities related to the procurement, use, or training related to pesticides, a PERUSAP will be prepared for BEO approval.

☐ **4. Activity Cancellation:** The activity poses significant and unmitigable adverse environmental effects. Adequate EMMPs cannot be developed to eliminate these effects and alternatives are not feasible. The project is not recommended for funding.

Note regarding applicability related to Pesticides (**216.2(e): The exemptions of §216.2(b)(l) and the categorical exclusions of §216.2(c)(2) ***such as technical assistance, education, and training are not applicable to assistance for the procurement or use of pesticides.

H. EMMPs *(Using the format provided below, or its equivalent, list the processes that comprise the activity, then for each, identify impacts requiring further consideration, and for each impact describe the mitigation and monitoring measures that will be implemented to avoid or adequately minimize the impacts. All environment, health, and safety impacts requiring further consideration, which were identified in Section F., should be addressed)*

1. Activity-specific environmental mitigation plan (Upon request, the MEO may be able to provide your project with example EMMPs that are specific to your activity.)

Processes	Identified Environmental Impacts	Do the Impacts Require Further Consideration?	Mitigation Measures	Monitoring Indicators
List all the processes that comprise the activity(s)(e.g. asbestos roof removal, installation of toilets, remove and replace flooring) A	*A single process may have several potential impacts—provide a separate line for each.*	*For each impact, indícate **Yes** or **No**; if **No**, provide justification, e.g.,: (1) There are no applicable legal requirements including permits or reporting and (2) There is no relevant community concern and*	*For each impact requiring further consideration, describe the mitigation measures that will avoid or adequately minimize the impact. (If mitigation measures are well-specified in the IEE, quote*	*Specify indicators to (1) determine if mitigation is in place and (2) successful.* *For example, visual inspections for seepage around*

Processes	Identified Environmental Impacts	Do the Impacts Require Further Consideration?	Mitigation Measures	Monitoring Indicators
line should be included for each process.		*(3) Pollution prevention is not feasible or practical and* *(4) Does not pose a risk because of low severity, frequency, or duration*	*directly from IEE.)*	*pit latrine; sedimentation at stream crossings, etc.)*

2. Activity-specific monitoring plan

Monitoring Indicators	Monitoring and Reporting Frequency	Responsible Parties	Records Generated
Specify indicators to (1) determine if mitigation is in place and (2) successful (for example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)	*For example:* *"Monitor weekly, and report in quarterly reports. If XXX occurs, immediately inform USAID COR/AOR."*	*Separate parties responsible for mitigation from those responsible for reporting, whenever appropriate,*	*If appropriate, describe types of records generated by the mitigation, monitoring, and reporting process.*

I. Certification of No Adverse or Significant Effects on the Environment

I, the undersigned, certify that activity-specific baseline conditions and applicable environmental requirements have been properly assessed; environment, health, and safety impacts requiring further consideration have been comprehensively identified; and that adverse impacts will be effectively avoided or sufficiently minimized by proper implementation of the EMMP(s) in Section G. If new impacts requiring further consideration are identified or new mitigation measures are needed, I will be responsible for notifying the USAID COR/AOR, as soon as practicable. Upon completion of activities, I will submit a ***Record of Compliance with Activity-Specific EMMPs*** using the format provided in ERC Annex 1 or its equivalent.

____ ______________________________

Implementer Project Director/COP *Name* Date

J. Approvals:

USAID COR/AOR *Name* Date

Mission Environmental Officer *Name* Date

Distribution:

- Project Files
- Bureau Environmental Officer

ERC ANNEX 1
RECORD OF COMPLIANCE WITH ACTIVITY-SPECIFIC ENVIRONMENTAL MITIGATION AND MONITORING PLANS (EMMPs)

Subject:	*Site or Activity Name/Primary Project Name/IEE DCN Number*
To:	*COR/AOR/Activity Manager Name*
Copy:	*Mission Environmental Officer Name*
Date:	

The [*name of the implementing organization*] has finalized its activities at the [*site name*] to [*describe activities and processes that were undertaken*]. This memorandum is to certify that our organization has met all conditions of the EMMPs for this activity. A summary of the how mitigation and monitoring requirements were met is provided below.

1. Mobilization and Site Preparation

2. Activity Implementation Phase

3. Site Closure Phase

4. Activity Handover

Sincerely,

______________________________ ____________________
Implementer Project Director/COP *Name* Date

Approved:

______________________________ ____________________
USAID/COR/AOR/Activity Manager *Name* Date

Distribution:
- Project Files
- MEO
- Bureau Environmental Officer