https://ecd.usaid.gov/document.php?doc_id=62164

# INITIAL ENVIRONMENTAL EXAMINATION (IEE)

**Overview:** The purpose of this umbrella IEE is to address the entire portfolio of envisioned activities within the RPGO regional and bilateral democracy, human rights and governance, conflict prevention and mitigation; and preventing/countering violent extremism programs. This IEE is intended to cover the envisioned range of activities under the RPGO expanded portfolio for FY 2024 through FY 2029.

**ORGANIZATIONAL DATA**

| | |
|---|---|
| **Activity Name:** | Democracy, Peace, and Stability Enhanced (Regional Development Objective 1 under RDCS) |
| **Geographic Location(s):** | 15 ECOWAS Member states; Chad, Cameroon; Mauritania |
| **Funding Operating Unit(s):** | USAID West Africa, Regional Peace and Governance Office |
| **Other Involved Operating Unit(s):** | West Africa Regional<br>AFR Bureau |
| **Funding Account(s):** | DA/DV: ESF; PSF; ES-OCO-S; ES-OCO-PSF |
| **Solicitation/Contract/Award Number(s) :** | Task Order No. 72062422F00001 (SRPS)<br>Task Order No. 7200AA20D00016/72062422F00001 (PELA II)<br>Cooperative Agreement No. 72062422CA00001 (PARC Cameroon)<br>Cooperative Agreement 720624IO00002 (Coastal States Stability Mechanism (CSSM))<br>Other activities under design recipient of same funding streams and similar in scope and type of efforts |
| **Mechanism Type:** | Multiple mechanisms including contracts, cooperative agreements; APS; PIOs; Task Orders under IDIQ |
| **Implementing Partner(s):** | DAI, FHI 360, KHULISA MANAGEMENT SERVICES, INC, IOM; and TBD (to be procured) |
| **Prepared by:** | USAID/West Africa Regional Mission |

**IEE DOCUMENT TRACKING**

| | |
|---|---|
| **Activity Start/End Date**<br>**If Amended, New End Date:** | FY 2024-FY 2029 |
| **IEE or Amendment Expiration Date:** | March 31, 2030 |
| **Bureau Tracking ID:** | https://ecd.usaid.gov/document.php?doc_id=62164 |
| **If an Amendment, Tracking ID of Preceding Compliance Document(s)** | N/A |
| **Tracking ID or Hyperlink of Other Related Compliance Documents** | West Africa RPGO IEE 2019-2023, expired Oct 2023<br>https://ecd.usaid.gov/document.php?doc_id=51697<br><br>Promote Conflict Mitigation and Regional Stability WQAP PDev, expired Sept 2018<br>https://ecd.usaid.gov/document.php?doc_id=39306 |
| **Sector Type(s)** | Democracy, Human Rights, Governance Gender Youth Infrastructure |

**ENVIRONMENTAL COMPLIANCE REVIEW DATA**

| | |
|---|---|
| **Environmental Determination(s)** | Categorical Exclusion Negative Determination |
| **Additional Analyses or Reporting Required:** | PERSUAP EMMP/R |
| **Construction included, as defined by ADS 201 and 303** | Yes, included |
| **Verification of No Impact to Threatened or Endangered Species or Critical Habitat per 216.5** | No Impact |
| **Verification of Work Taking Place in Parks and Protected Areas** | No, PASS conditions are not applicable |
| **Climate Risks Identified (#) in Annex 1:**<br>**Climate Risks Addressed (#) in Annex 1:** | Low:>10 Moderate:1 High:1<br>Low:>10 Moderate:1 High:1 |

## PURPOSE OF THE IEE

In accordance with Title 22, Code of Federal Regulations, Part 216 (22 CFR 216), this document is the first review of the reasonably foreseeable effects of a proposed action on the environment. Its function is to document the factual basis as to whether an Environmental Assessment will be required. This document sets out conditions necessary to eliminate or mitigate significant adverse impacts. This document also captures (in Annex 1) the results of the Climate Risk Management process, in accordance with USAID policy (ADS 201mal).

The Agreement and Contracting Officers Representatives (AORs/CORs) of these activities are responsible for ensuring that the Regional Acquisition and Assistance Office (RAAO) incorporates these conditions into solicitations and awards. This is especially important during the Post Award Briefings and during work plan preparation and work plan reviews. Incorporation of environmental requirements in procurement documents ensures that the Implementing Partners (IP) apply environmental compliance issues during the design, planning, budgeting, implementation, monitoring, and evaluation of activities.

This particular IEE addresses the entire portfolio of envisioned activities within the RPGO regional conflict prevention and mitigation, prevention and countering of violent extremism, and democracy, human rights, and governance (DRG) programs. This IEE is intended to cover the envisioned range of activities under the RPGO expanded portfolio for FY 2024 through FY 2029.

## SUMMARY

RPGO will support regional institutions' efforts to implement conflict prevention and mitigation activities by supporting countries experiencing political crises, demonstrating signs of fragility, or emerging from conflict. Programs will employ a participatory approach by engaging a broad range of political actors, state institutions, regional bodies such as Economic Community of West African States (ECOWAS) and others, civil society organizations (CSO), media, and government officials.

While the majority of the activities involve actions that do not have an impact on the physical environment, there are interventions that may potentially take place that require mitigations as detailed in the Conditions in Section 3.

Namely:

- All Negative Determination with Condition (NDwC) activities must be addressed in an Environmental Mitigation and Monitoring Plan (EMMP) by each activity, as applicable.
- Small grants are not fully defined and will require an additional screening process using the Environmental Review Form/Report. The ERR/ERF must be cleared by the MEO and REA.
- Support for pesticide assistance must complete an Activity PERSUAP in accordance with the Mission's Programmatic PERSUAP. Consult the AFR BEO if there is not a Mission Programmatic PERSUAP or the PERSUAP has expired. Activities funded through CPS should consult the CPS BEO prior to completing the PERSUAP.
- Construction activities are limited to those considered small-scale (see details in Section 3). The A/COR and MEO must consult with the cognizant BEO if construction does not conform to these limits.
- Water provision activities will require a Water Quality Assurance Plan cleared by the A/COR and the MEO.

## BEO COMMENTS

**Reporting Conditions:** The AFR BEO requests that the activity managers/AORs/CORs upload this document to the appropriate sub-folder(s) of the Environmental Compliance Library (EC Library) Google Drive folder. In addition, implementation documents such as Environmental Mitigation and Monitoring Plans (EMMPs), sub-project screening documents, etc., should be maintained in this EC Library folder. Using this common folder will facilitate access by all parties who need these documents, including the Mission Environmental Officer and the AOR/COR, as well as the REA and the BEO Team.

## IMPLEMENTATION

In accordance with 22 CFR 216 and Agency policy, the conditions and requirements of this document become mandatory upon approval. This includes the relevant limitations, conditions and requirements in this document as stated in Sections 3, 4, and 5 of the IEE.

# USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

**Activity Name: RPGO IEE 2024-2029**

| | | |
|---|---|---|
| **Approval:** | /s/ Kitty Andang | 05/06/2024 |
| | Kitty Andang, DMD for Jo Lesser-Oltheten, Mission Director | Date |
| Clearance: | /s/ Patrick Smith | 4/25/2024 |
| | Patrick Smith, RPGO Office Director | Date |
| Clearance: | /s/ Ina Pislaru | 04/17/24 |
| | Ina Pislaru, RPGO COR/ AOR | Date |
| Clearance: | /s/ Henry Aryeetey | 03/12/24 |
| | Henry Aryeetey, Regional Environmental Advisor | Date |
| Clearance: | /s/ Victor Mombu | 4/10/2024 |
| | Victor Mombu, Mission Climate Integration Lead | Date |
| Clearance: | /s/ Tashiana Osborne | 05/29/2024 |
| | Tashiana Osborne, Bureau Climate Integration Lead | Date |
| **Concurrence:** | /s/ Brian Hirsch | 5/30/2024 |
| | Brian Hirsch, AFR Bureau Environmental Officer | Date |
| **Concurrence:** | /s/ Brian Ward | 5/30/2024 |
| | Brian Ward, CPS Bureau Environmental Officer | Date |

**Distribution:** Award File; Environmental Compliance Database

# TABLE OF CONTENTS

## ACTIVITY OVERVIEW & DESCRIPTION

The development objective of the Regional Peace and Governance Office (RPGO) is Democracy, Peace, and Stability enhanced, which supports and strengthens regional and national capacity and commitment to open, accountable, inclusive, and democratic governance through strengthening participatory, representative, and inclusive political processes and government institutions; promoting greater accountability of institutional leaders to citizens and to the law; and supporting partner countries' pathways toward stability and peace. RDO 1 activities and efforts also address the risks of instability from violent conflict, and prioritize targeted conflict and violence prevention, peacebuilding, and preventing and countering violent extremism (P/CVE) interventions across the sub-region. This work is accomplished through a portfolio of programs implementing activities at the regional, bilateral, and local level.

RPGO will support regional institutions' efforts to implement conflict prevention and mitigation activities by supporting countries experiencing political crises, demonstrating signs of fragility, or emerging from conflict. Programs will employ a participatory approach by engaging a broad range of political actors, state institutions, regional bodies such as Economic Community of West African States (ECOWAS) and others, civil society organizations (CSO), media, and government officials. RPGO efforts will encourage youth and women to be equal partners in preventing conflict by involving young leaders and women's organizations in developing responses to violence triggers, establishing and supporting capabilities to engage in peacebuilding that can anticipate and prevent instability and large-scale violence before it erupts. RPGO will invest in both short-term efforts to mitigate escalating conflict risks and in longer-term efforts to address underlying vulnerabilities of violent conflict, and will reinforce local, national, and regional conflict prevention systems and action plans, and address vulnerabilities that fuel conflict and undermine civilian security by enhancing partner nations' prevention and peacebuilding efforts. RPGO will support civil society networks, religious and ethnic minorities, women and youth, and members of faith-based groups to contribute to conflict prevention and peacebuilding efforts.

Assistance will also focus on taking proactive steps to promote peace and security, as well as address violent extremist threats, including emerging threats in select coastal states, and contribute to ensuring that violent extremist organizations do not disrupt countries' progress. The underlying premise is that if VE is allowed to spread from the Sahel to the littoral states in West Africa, then it will have a devastating effect to increasing negative trends of democratic backsliding and closing political space in the region, and providing opportunities for other malign actors to spread their influence in the region. RPGO will work to reduce support for violent extremism as P/CVE efforts will strengthen abilities of regional partner institutions, such as ECOWAS and others, national governments, and civil society actors, to better understand and prevent violent extremism; support efforts to implement regional and national P/CVE policies and strategies; and increase coordination between member states to implement regional P/CVE efforts in a collaborative and effective manner.

Assistance will include training and capacity building for senior officials and technical specialists across government and regional institutions to design and implement effective P/CVE interventions to build the capacities of CSOs, equip key decision makers and actors in the region to better detect, and report on VE trends and prevent human rights abuses. In areas facing an active or imminent threat of extremist violence and recruitment, USAID's targeted efforts will improve community cohesion and P/CVE narratives and promote tolerance of marginalized religious and ethnic groups through inter-ethnic and religious dialogue. USAID's P/CVE efforts will continue to facilitate the protection of human rights and fundamental freedoms, including through human rights education and training as part of the P/CVE regional and national interventions. Recognizing that violent extremist organizations systematically carry out acts of

violence associated with human trafficking to achieve their strategic objectives, USAID funded P/CVE training and capacity building will incorporate counter trafficking elements. USAID will also promote the rule of law and human rights in the context of its P/CVE strategies to help governments improve accountability, effectiveness, and legitimacy. This approach will blend systems-level investments in the broader enabling environment with intensive community-level programming in limited geographic zones at immediate risk.

Finally, RPGO will support research to examine key violent extremism drivers to continue to provide a robust evidence-based analysis and continue to inform the conflict prevention and P/CVE programming. With a focus on gender roles, RPGO programs will address barriers to women's participation in political and civic life and engage women as peacebuilding actors and peace ambassadors at the regional and national levels.

**TABLE 1: ILLUSTRATIVE ACTIVITIES, SUB-ACTIVITIES, OR INTERVENTIONS**

| Activity | CatEx | NDwC |
|---|---|---|
| Activity 1 - Capacity building including the provision of short-term technical assistance, including but not limited to Preventing/ Preventing /Countering Violent Extremism training for government and non-government actors at the regional, national and local levels | X | |
| Activity 2 - Social institution building or strengthening including supporting dialogue, creating public forums or similar activities working with communities, groups, or individuals. | X | |
| Activity 3 - Technical assistance and training with the objective of improving media content, including but not limited to support of radio programming and social media use around conflict, P/CVE, and mis/dis/mal-information | X | |
| Activity 4 - General capacity building for CSOs including training in budget management, staff and recruitment, proposal writing, learning and community development | X | |
| Activity 5 - Conflict prevention, mitigation, early warning, and response training | X | |
| Activity 6 - Workshops to promote social cohesion and local governance/community-based interventions | X | |
| Activity 7 - Analyses, studies, academic or research workshops and meetings: Dialogue support, creating public forums or similar activities working with communities, groups, or individuals; | X | |
| Activity 8 - Document and information transfers: Strategic communications and public outreach (such as polling, training for strategic planning, information dissemination, media programming and transmission, and communications support to government and NGOs) | X | |
| Activity 9 - Studies 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.) | X | |
| Activity 10 - Women and youth (W/Y) education, training, improvement of access to information on economic opportunities, and increased access to financial services for W/Y to start small and medium-sized enterprises (SMEs) | X | |
| Activity 11 - Leadership training and capacity building for Government and Traditional leaders, and other significant local leaders | X | |
| Activity 12 - Hygiene education and sanitation promotion, consisting of public health and hygiene education and promotion of improved sanitation, and | X | |

| Activity | CatEx | NDwC |
|---|---|---|
| community awareness; and community development and capacity building, such as formation of Water and Sanitation Committees | | |
| Activity 13 - Non-technical skills training in counter-violent extremism, conflict mitigation, early warning systems, violent-extremist organization tactics, civilian/security relationship building, dangers of drug abuse and consumption, and community networking/platform building | X | |
| Activity 14 - Training in micro-business skills including financial management and bookkeeping; and technical skills in community radio program content development | X | |
| Activity 15 - Capacity development for civil society organizations including institutional development, fundraising, communications, constituents engagement, proposal writing, etc. | X | |
| Activity 16 - Training for election observers | X | |
| Activity 17 - Training and provision of technical assistance for governments, civil society organizations, the media, and others to improve overall skills, transparency and good governance | X | |
| Activity 18 - Training and capacity building for peace building for civil society organization across West Africa | X | |
| Activity 19 - Training legislative bodies, including but not limited to anti-corruption practices, rule of law democratic practices, P/CVE, and human rights | X | |
| Activity 20 - Support for voter registration and logistics | X | |
| Activity 21 - Consensus building forums and events around conflict prevention, mitigation, and preventing/countering violent extremism | X | |
| Activity 22 - Capacity building and technical assistance for electoral commissions to organize local, district and general level elections | X | |
| Activity 23 - Technical assistance to political parties | X | |
| Activity 24 - Technical assistance for legislature for developing policies and improving the rule of law | X | |
| Activity 25 - Developing positive messages to counter violent extremism through the use of social media and innovative technologies | X | |
| Activity 26 - Small grants activities - projects or programs intended to develop the capability of recipient countries to engage in development planning. Grants which might result in activities directly affecting the environment (such as construction of facilities, etc.) must follow mitigations identified in other similar activities below.[1] | X | |
| Activity 27 - Analysis of the specific drivers of violent extremism in targeted geographic locations | | |
| Activity 28 - Support to emerging methods of measuring project performance (complexity aware) in high threat environments | X | |
| Activity 29 - Evaluating P/CVE, DRG, and conflict early warning conflict interventions | X | |
| Activity 30 - Organizing regional learning events to improve and educate practitioners in effective DRG, P/CVE, conflict prevention and mitigation interventions | X | |
| Activity 31 - Monitoring, Evaluation and Learning Capacity Building | X | |
| Activity 32 - Construction activities, including new community radio stations, | X | |

[1] Small grant activities may include support of round-tables, conferences, workshops, and/or cultural festivals or performances (including through radio, internet, and television) that would promote peace and tolerance between communities; awareness and engagement of government and nongovernment actors

| Activity | CatEx | NDwC |
|---|---|---|
| rehabilitation of existing community radio station | | |
| Activity 33 - Construction and rehabilitation of individual markets, youth centers, rehabilitation of community centers, schools, transport yards | | X |
| Activity 34 - Rehabilitation of existing social service infrastructure including schools or training centers | | X |
| Activity 35 - Small-Scale New Construction or Repair and Rehabilitation of Public Facilities and Spaces | | X |
| Activity 36 - Small scale construction or rehabilitation not in the presence of complicating factors (construction of new sources of potable water or new sewer systems[2]) | | X |
| Activity 37 - New small-scale building construction (<1000m$^2$), such as schools, health care facilities, office buildings, and other government buildings, and market spaces; | | X |
| Activity 38 - Reconstruction, rehabilitation, or repair of buildings (<1000 m$^2$), such as schools, health care facilities, office buildings, and other government buildings, and market spaces, including demolishing, re-constructing, refurbishment, painting, and repair of utilities; and | | X |
| Activity 39 - Improvement of urban spaces and public parks by installing public art, playgrounds, conducting beautification projects, and will mainly involve installation of art, vegetation, trash bins, and other actions to beautify neighborhoods, parks, and other public spaces (including neighborhood clean-up). | | X |
| Activity 40 - Micro and Small Enterprises (MSEs) Support where significant interaction with equipment, materials or wastes are involved may include: support and skills building for small and medium sized businesses, including: leather processing (tanneries); food processing; brick and tile manufacturing; small-scale mining; metal working; wood processing and furniture-making; electrical repair shops; waste collection, sorting and recycling services | | X |
| Activity 41 - Livelihoods training and support, such as making foods, sewing/tailoring, catering, water and soft drink sales. | | X |
| Activity 42 - Small-Scale Rehabilitation of Water and Sanitation Facilities such as Rehabilitation or establishment of new connections to surface water, wells/boreholes, and rainwater harvest; Construction and rehabilitation of sanitation facilities such as composting toilets, flush toilets, septic tanks, and latrines; WASH equipment maintenance (e.g., for potable water sources/boreholes) | | X |
| Activity 43 - Commodity Procurement: Procurement and distribution of agricultural start-up kits (inclusion of pesticides will require an approved PERSUAP); Provision and distribution of veterinary supplies, and livestock/poultry; Provision of emergency power supplies and fuels; Provision of moving and transport equipment (i.e. motorcycle parts, oils, solvents, antifreeze and gasoline); and Provision of lighting devices. | | X |
| Activity 44 - Festivals, tournaments, rallies, concerts, distribution/handover ceremonies, sporting events, competitions and training sessions, and community | X | |

[2] Sites with no complicating factors are:
- Not within 30m of a permanent or seasonal stream or water body;
- Do not involve displacement of existing settlement/inhabitants;
- Have an average slope of less than 5%;
- Not heavily forested, or in an otherwise undisturbed local ecosystem, or in a protected area;
- Disturbed area of no greater than 1,000 sq meters or 10 km (for rural feeder roads);
- sLess than $250,000 total construction costs.

| Activity | CatEx | NDwC |
|---|---|---|
| town hall meetings. Events may take place in open air public spaces or in conference centers | | |
| Activity 45 - Small-Scale Agricultural Activities: activities may include technical and operational support for developing and strengthening small-scale agriculture inclusive of livestock, dairy production, crop production, poultry, and beekeeping, and training on modern farming techniques | | X |
| Activity 46 - Education and training related to safer pesticide use or technical assistance for development of host country pesticide regulatory capabilities, not involving actual application procurement or use of pesticides; Training in use of pesticides involving actual demonstrations with pesticides; and Inclusion of pesticides in agricultural start-up kits (requiring an approved PERSUAP). | | |
| Activity 47 - IT and electronics procurement, typically as a component of a larger activity, and specifically larger servers, desktop and laptop computers, radios, field monitoring devices, and other IT or electronics equipment to the Niger government ministries, civil society partners, and media. Typical planning and logistical considerations will include safe disposition of the commodities to the beneficiary and the beneficiary's plan for handling, storage, and, as these supplies and equipment will degrade over time, they must be disposed of properly at the end of their life | | |
| Activity 48 - Installation of Small Energy Systems: Investigation of small energy production alternatives; Purchase and installation of solar power plants <20 kw; and Solar water heaters generally sized for household or building (i.e., lodging). | | |

# 1. BASELINE ENVIRONMENTAL INFORMATION

## 1.1 LOCATIONS AFFECTED AND ENVIRONMENTAL CONTEXT (ENVIRONMENT, PHYSICAL, CLIMATE, SOCIAL)

Declines in democratic governance and respect for human rights in West Africa continue to accelerate. Political processes across West African states have become increasingly restrictive, with opposition parties in many countries being excluded from political participation and governance. The space for independent civic and political activity has continued to shrink, as incumbent leaders worked to silence dissent. Elections are conducted with major procedural irregularities, power sharing is limited, political transitions are marred by a rise in violence and intimidation, and governments increasingly limit access to information. The manipulation of online content during the electoral period and the governments' increasing hostility toward the media threatens free expression and accountability in many countries in the region. Furthermore, violent extremism, as well as other forms of violence, remain a persistent threat that can destabilize countries and the West Africa sub-region, destroy families and communities, impede economic growth, redirect resources from productive use, and generate internal displacements that put pressure on the USG and regional and national partners' development efforts. Violent extremism is an increasingly serious threat to fragile Sahelian states that already face significant security and development challenges, and of particular concern to West African coastal states is the steady spillover of VEO influence and attacks from the Sahel.

These political challenges can be compounded by on-going risks of environmental degradation, particularly in the fragile Sahel region. Management and governance of natural resources have also

proven problematic both in environmental and conflict terms. Unresolved land disputes, poverty, competition over diminishing natural resources, illicit trade in commodities and labor conflicts around extractive industries can all feed into the dynamics of armed conflict in the region. Addressing issues of good governance, peace and stability in the region are essential in order to protect development gains already made and provide a secure platform upon which the people of West Africa can continue to improve their lives.

### 1.2 APPLICABLE AND APPROPRIATE PARTNER COUNTRY AND OTHER INTERNATIONAL STANDARDS (E.G. WHO), ENVIRONMENTAL AND SOCIAL LAWS, POLICIES, AND REGULATIONS

Activities that would involve any construction or rehabilitation work are yet to be defined, therefore at this time the countries are yet to be identified. However, preliminary RPGO planning focuses on ECOWAS member states, Mauritania, Chad, and Cameroon with flexibility to expand to other countries in the region. Applicable laws, regulations and permitting requirements will be identified during planning at each selected site.

### 1.3 COUNTRY/MINISTRY/MUNICIPALITY ENVIRONMENTAL CAPACITY ANALYSIS (AS APPROPRIATE)

**Environmental Laws and Policies in West Africa**

Covering approximately one-quarter of the continent, West Africa contains diverse bio-climatic regions including rainforests, coastal plains, lowland plateaus, deserts, and isolated highlands, such as the Guinea Highlands, Jos Plateau, Aïr Mountains, and Cameroon Highlands. Issues include deforestation, soil degradation, air pollution, water pollution, garbage pollution, climate change, water scarcity and oil spills (resulting in problems with access to safe water supply and sanitation). West Africa is an immense and diverse region of 21 countries with rich ecosystems, including the Guinean Forests, which are recognized as one of 35 global biodiversity hotspots teeming with a high diversity of plants and animals. These ecosystems face significant threats and are under tremendous pressure from increasing population, poverty, unsustainable and illegal land use practices, logging, climate change, poor governance and ineffective policies.[3]

In West Africa, climate change continues to impact social and economic sector activities. The World Bank has identified rising sea levels and coastal erosion across the region as major risks, increasing the exposure and vulnerability of communities and assets.[4] A 2021 report also estimated that by 2050, up to 32 million people could be displaced in the region as a consequence of slow onset climate impacts in response to water scarcity, declines in crop productivity and ecosystem productivity, and sea level rise, augmented by storm surge. [5] In response, the ECOWAS released its first-ever regional climate strategy in

[3] *Environment - Biodiversity and climate change: West Africa Regional.* U.S. Agency for International Development. (2023, February 28). https://www.usaid.gov/west-africa-regional/environment-biodiversty-and-climate-change

[4] *The effects of climate change on coastal erosion in West Africa : Les Effets du Changement Climatique sur l'érosion du Littoral Ouest-Africain.* World Bank. (n.d.). https://documents.worldbank.org/en/publication/documents- reports/documentdetail/241611467990948068/les-effets-du-changement-climatique-sur-l-%C3%A9rosion-du- littoral-ouest-africain

[5] *Rigaud, K. K., de Sherbinin, A., Jones, B., Adamo, S., Maleki, D., Abu-Ata, N. E., Casals Fernandez, A. T., Arora, A., Chai-Onn, T., & Mills, B.* (n.d.). Groundswell Africa: Internal Climate Migration in West African countries. Open Knowledge Repository. https://openknowledge.worldbank.org/entities/publication/40244111-bcdd-57c9- a51f-6d1bab9d9b37

2022, which involves integrating mitigation and adaptation goals into regional policies, as well as strengthening political dialogue among member states.[6]

While most West African countries have legislation and policies aimed at natural resource governance, they are often ill equipped to implement, monitor and enforce those established laws and policies. In addition, many policy frameworks remain undeveloped. For instance, most countries in West Africa have developed the National Adaptation Programme of Action but few have made significant progress on developing REDD+ Readiness plans for Reducing emissions from deforestation and forest degradation in developing countries (REDD+), National Adaptation Plans (NAPs), or coastal development frameworks. Poor integration of government structures at a variety of levels - regional, national and local - often leads to confusing and contradictory policies, which acts as a disincentive for people to invest in improved resource management.

Specific environmental laws and policies for all target countries where RPGO activities will be implemented are provided below:

**Burkina Faso**
The management of environmental issues is the responsibility of the Ministère de l'Environnement et du Cadre de Vie.

The regulatory texts on environment are:

- Article 005/97/ADP of 30th January 1997 - regulating environmental issues
- Article 022-2005/AN of 24th May 2005 - regulating public hygiene
- The National Action Plan on Environment (NAPE-1991 and amended in 1994).

In Burkina Faso, law N°005/97/ADP of January 30, 1997 has established two different procedures to evaluate environmental impact: the Environmental Assessment Study (Etude de l'Impact sur l'Environnement – EIE) and the Note on Environmental Impact (Notice d'Impact sur l'Environnement - NIE). The first is a detailed study aimed at identifying and evaluating at an early stage the impacts of a given project. The Note on Environmental Impact is a simplified study aimed at identifying and evaluating the impacts of a given project. The goal of these studies are to: (1) provide an overall vision of the project, potential impacts and mitigation measures; (2) favor social acceptance; (3) choose the most appropriate technology in terms of both financial and ecological sustainability; (4) facilitate monitoring. The Ministry in charge will decide over the environmental feasibility of the project based on the NIE and the EIE.

Burkina Faso's Environmental guidelines (Law n°005/97/ADP of 30 January 1997) stipulate (Section 7) that all activities which might cause harm to groundwater and surface water resources must be regulated and monitored by the Ministry of Environment.

The Decree (N°2001-342/PRES/PM/MEE) of July 17, 2001 establishes the procedures for EIE and NIE in Burkina Faso. In the first phase, a project proposal is evaluated, and based on a classification established by decree, projects are divided into categories. The second phase is the environmental study, which must include consultation with the beneficiaries of the project (Art 3.2.1). The post-study phase consists

[6] *Economic Community of west african states*. (n.d.). https://www.climatestrategy.ecowas.int/images/documentation/Short%20version%20-%20ECOWAS%20Regional%20Climate%20Strategy%20(2022-2030).pdf

of a public inquiry and the examination of the report and monitoring activities, aimed at verifying that the necessary mitigation measures are put in place (Art. 3.3.3).

**Niger**

Niger environmental policy is defined in the National Environment Plan for a Sustainable Development, which was adopted by the Government in April 2000. The aim of this policy is to set up favorable conditions for the long-term improvement of food security, find a solution to the domestic energy crisis, improve health conditions, and promote the economic development of the people and the country. In operational terms, the issue is to systematize the management of the environmental concerns in all the decisions related to the development of the country. Of all the possible types of interventions, integration is generally recognized as the most effective. It consists in taking the environmental concerns into consideration from the very step of the planning and definition of the intervention (program, project or activities). Thus, it relies on a certain number of practical tools among which are the environmental evaluation (EE) and the impact study on the environment (ISE).

The national environmental policy is supported by Law No 98-56 (December 1998) concerning the framework relative to environment management. This law deals with several environment sectors, both the natural environment and the human environment, and addresses the National Environment Plan for a Sustainable Development and impact studies on the environment in its articles 27 and 31 respectively, two fundamental environment management tools for the country. This law makes it mandatory for the government to set up the National Environment Plan for a Sustainable Development (PNEDD) and review it every five years.

Other legislative and statutory texts concerning environmental policy are as follow:

- Law No. 98-56 dated December 29, 1998 concerning the management framework law of the environment in Niger.
- Legislative Decree No 93-014 dated March 2, 1993 concerning water regulations completed by the Law 98-56 of December 1998.
- Legislative Decree No 93-015 dated March 2, 1993 setting the orientation principles of the rural code.
- Legislative Decree No 93-015 dated March 2, 1993 setting up hygiene codes.

As for governmental institutions, two are of most interest in the area of solid waste management including the National Environment Council for a Sustainable Development (CNEDD) and the Department of Environmental Evaluation and Impact Studies (BEEEI). The CNEDD was established by Decree No 96-004/PM in 1996 and is a deliberating body whose mission is to design, implement, monitor and evaluate the implementation of the National Environment Plan for a Sustainable Development (PNEDD). The CNEDD is regularly consulted through its Executive Secretariat, to provide advice on reports on environment impact and any ongoing project, program or plan for the different environment sectors.

The BEEEI was created by Ordinance No 97-001 of 1997 and is the body in charge of the administrative management of the environmental evaluation process and impact studies of the country. In this capacity, it organizes and operates the Department of Environmental Evaluation and Impact Studies.

The Environmental Law in Niger provides guidelines for WATSAN development in the country. Article 42 establishes that usage of boreholes and wells should take into account the whole hydrological basin so as to minimize environmental impacts on water quality and quantity.

The Niger Environmental law (N°98-56 of 1998 of December 29, 1998) states that all development activities, projects and programs that might have relevant impacts on the social and natural environment require an Environmental Assessment and an authorization from the Ministry responsible for the environment (at present the Ministre de l'Eau, de l'Environnement et de la Lutte contre la Désertification). The Decree (N°2000-398/PRN/ME/LCD) of 20 October 2000, lists all projects and activities that are subject to environmental assessment.

**Chad**

The environment, as defined in the Chadian government, includes forestry, fisheries, and wildlife. These are now the responsibility of the Ministry of Agriculture and Environment, recently created by combining the old Ministry of Agriculture with the environment-related directorates of the old Ministry of Environment and Tourism. Three directorates were moved from the old ministry. The Directorate of Forests and Environmental Protection is responsible for managing and protecting all forest land in the country. In the capital, it is divided into three services; forests and forest product promotion, reforestation and soil conservation, and hunting. The forest product promotion group is responsible for the recent work on gum arabic, and for commercialization of karite. Several forest management projects are being managed by the reforestation and soil conservation service, with support from FAO, the European Community, and other donors; despite the name, soil conservation is the responsibility of another ministry. The Directorate of National Parks and Faunal Reserves is similarly hampered by lack of resources. It is responsible for wildlife protection and management of the country's two national parks, seven faunal reserves, and two hunting reserves.

N'Djamena similarly has no system for disposing of most household solid waste. In some neighborhoods wastes are buried in the courtyards. Often, they are piled in the street, where they are picked through by animals and people and sometimes burned. This can obviously create health hazards, which will become more severe as the city grows and its population becomes denser.

**Mauritania**

Law no. 2000-045 (the Environmental Code) establishes the general principles that should form the basis of the national policy for the protection of the environment and serves as a basis for the harmonization of ecological imperatives with the requirements of sustainable economic and social development. This national policy strives to guarantee the following:

- The conservation of biological diversity and the rational use of natural resources;
- The fight against desertification;
- The fight against pollution;
- Improvement and protection of the living environment; and
- The harmonization of development with the safeguarding of the natural environment.

Articles 31 to 34 relate to the protection of the atmosphere, with Article 33 stating that when emissions into the atmosphere are likely to pose a threat to people or property, the proponents must implement all appropriate measures to suppress or reduce their pollutant emissions. Recently, the Ministry of

Environment and Sustainable Development created a national strategy and action plan from 2017-2030, with a focus on reversing environmental degradation trends so that the development of natural resources contributes effectively to ensuring green and inclusive growth. Strategic objectives include: 1) Integrated environmental governance adapted to challenges; 2) Integrated and sustainable management of natural resources and terrestrial biodiversity; 3) Sustainable management of the marine and coastal environment; and 4) Strengthening the prevention and management of pollution and anthropogenic threats.

**Mali**

The Malian constitution recognizes all citizens' "right to a healthy environment" and stipulates in article 15 that the "protection of the environment and the assurance of quality of life is the purpose and responsibility of the state". USAID and implementing partners will ensure that norms regarding environmental protection are respected.

Law 89-61/AN-RM of September 2, 1989 states that the importation of toxic waste will be prohibited. USAID will not be involved in the importation of toxic waste.

Law 01-20/AN-RM of April 26, 2001 stipulates that harmful chemical substances "which can pose a danger to man or his environment are subject to tight regulation and inspections by Ministries in charge of environment and public safety." USAID will not be involved in the use of harmful chemical substances.

Order 01-046/PRM of September 20, 2001 authorizes the ratification of the Communal Regulation of member states of the Inter-State Committee for Drought Control in the Sahel (CILSS) on the registration of pesticides signed in N'djamena on December 16, 1999. USAID does not anticipate importing and or procuring any pesticides under this IEE.

Law 02-006 of January 31, 2002 maintains that the conservation, protection and management of water resources is obligatory by the Ministry of Environment and must be respected by all. Article 14 states that it is strictly prohibited to spill and contaminate the water bodies and their flora and fauna. USAID and partners will respect this law.

Order 02-049/P-RM of March 29, 2002 on the Creation of the Niger Basin Agency outlines the roles and responsibilities of the Niger River Basin Agency, which include the "preservation of the River, including the protection of terrestrial and aquatic ecosystems." USAID and implementing partners will respect and comply with the requirements of the River Niger Basin Agency and will respect basin environments to ensure there is no contamination of their flora and fauna.

Law 02-14/AN-PR of June 3, 2002 institutes the registration and the management of pesticides in the Republic of Mali. It states overall general principles on matters surrounding their importation, their chemical composition, packaging, repackaging, and the storage of pesticides. USAID does not anticipate importing and or procuring any pesticides under this IEE.

Decree 03-594/PRM of December 31, 2003 refers to the, which outlines the rules, regulations and procedures for Environmental Impact Assessments, which must be conducted by private or public projects implemented in Mali, including major industrial, agricultural, mining, artisanal, and commercial

or transport developments. The MHP will not implement any activities that meet the definition above of a "project" under decree No. 03-594/P-RM.

Decree 02-305 concerns the protection of vegetables and crop production. USAID will respect the protection of agricultural practices in the areas where USAID-funded activities are conducted.

National Plan for the Promotion of High Impact Hygiene Practices in the Framework of Reducing Diarrheal Diseases (2011 – 2015). This strategy is dated April 2004 and has the following objectives:

**Nigeria**

Applicable Nigerian National Policies, Laws, and Regulations include: Nigerian Constitution 1999: The 1999 Constitution clearly identifies important components of the environment covered by legislation. Section 20 of the Constitution aims to "protect and improve the environment and safeguard the water, air, land, forest and wildlife." Section 16 (2) of the Constitution states that "The State shall direct its policy towards ensuring the promotion of a planned and balanced economic development." Furthermore, Section 17 (2) (d) states that "In furtherance of the social order, exploitation of human or natural resources in any form whatsoever for reasons, other than the goal of the community shall be prevented."[7] National Policy on the Environment (Revised 2016): Sets the legal basis for all conservation activities by government agencies and affiliate stakeholders with environmental management. It derives its powers from the Constitution with the mandate of ensuring nation-wide environmental protection and conservation of natural resources for sustainable national development. This policy provides a solid framework for integrating biodiversity considerations into national planning, policy, and decision making.[8]

National Environmental Standards and Regulation Enforcement Agency (NESREA) Act (2007): Enacts NESREA as the institutional mechanism for sustainable development and environmental protection in Nigeria. NESREA replaces the Federal Environmental Protection Agency (FEPA) Act. It involves creation, review, and enforcement of national environmental regulations.[9]Harmful Waste (Special Criminal Provisions) Act, Cap H1, LFN (2004): This act prohibits the carrying, dumping, or depositing of harmful waste in the air, land, or waters of Nigeria.[10] Environmental Impact Assessment (EIA) Act, Cap E12, LFN (2004): Legislation that governs environmental impact assessment with respect to proposed projects in Nigeria and flows directly from the provisions of Principle 17 of Rio Declaration. [11] The Nigerian Urban and Regional Planning Act, Cap N138, LFN (1992): Describes the various types of physical development at different levels of government and oversees purposeful planning of the country. The goal is to protect

[7] "Nigeria's Constitution," Project Constitution, 1999, https://www.constituteproject.org/constitution/Nigeria 1999.pdf?lang=en.

[8] "National Policy on the Environment," Food and Agriculture Organization of the United Nations, 2016, http://www.fao.org/faolex/results/details/en/c/LEX-FAOC176320.

[9] "National Environmental Standards and Regulations," Food and Agriculture Organization of the United Nations, 2007, http://extwprlegs1.fao.org/docs/pdf/nig120569.pdf. 44 "Harmful Waste (Special Criminal Provisions, etc.)

[10] "Harmful Waste (Special Criminal Provisions, etc.) Act," Food and Agriculture Organization of the United Nations, 1988, http://extwprlegs1.fao.org/docs/pdf/nig18377.pdf.

[11] Environmental Impact Assessment (EIA) Act," Food and Agriculture Organization of the United Nations, 2004, http://extwprlegs1.fao.org/docs/pdf/ger36861E.pdf.

the environment from development. It establishes the Development Control Department and the Urban and Regional Planning Tribunal.[12]

**Benin**

Institutions for environmental management have developed slowly but steadily in Benin since the creation of the Ministry of Environment in 1992. The country adopted an overarching environmental law (loi cadre sur 1'environnement) in 1999 that places environmental impact assessment (EIA) at the core of the Government efforts towards achieving the goals of the sustainable development. The Benin Environmental Agency (Agence Béninoise pour l'Environnement [ABE]) was created in 1995 and shares the responsibility and objectives in the areas of environmental management and impact assessments with The Ministry of Environment and Natural Protection (MENP).

Through the late 1990s, EIA capacity building was emphasized as a key area of donor-funded environmental management efforts. These capacity building initiatives consisted of three main types of activities including (i) enacting a framework environmental law with specific requirements for EIA (and preparing and adopting implementation decrees for EIA law), (ii) developing sectoral guidelines for EIA, and (iii) holding several training workshops for the staff in line ministries, in consulting firms, and a few NGOs.1

The ABE also helped to create EIA cells in a number of ministries, including the Ministry of Health. The main role of these units is to undertake the screening of the public investment projects included in the budget of each year, and recommend appropriate actions (under the guidance of the ABE) with the goal of mitigating any residual negative environmental or social impacts. Based on the sectoral guidelines prepared by the ABE, they provide guidance and supervision of EIA studies and mitigation plans. However, these units' degree of activity varies across sectors: the Agriculture Ministry still retains important environment functions, and the units within the Transport Ministry and Water Directorate have been reinforced. Units in certain other ministries are hindered by lack of training and resources. Sector and regional focal points send monthly reports to ABE who elaborates an annual report, which is sent to both sector and regional focal points and shared online. 2

ABE has overall responsibility for ensuring that EIAs are carried out for all projects in accordance with national standards. The process is led and coordinated through the ABE's Department of Environmental Assessment and General Studies. This department's action strategy is based on the Environmental Impact Study Task Force. The Task Force is a forum of experts of national standing selected on the basis of their experience and skill from various public and private institutions. The Task Force meets at the request of the ABE, whenever it is necessary to study or prepare any EIA- related document or file. The EIA process in Benin consists of the following steps.

- Screening (pre-screening)
- Scoping (scanning)
- Public hearings
- Analysis of the environmental impact study report
- The decision
- Follow-up-assessment-audit

[12] "The Nigerian Urban and Regional Planning Act," Food and Agriculture Organization of the United Nations, 1992, https://www.ecolex.org/details/legislation/nigerian-urban-and-regional-planning-act-1992-lex-faoc120669/

**Ghana**

Ghana has a relatively well-developed set of environmental guidelines and standards. These laws include the Wild Animals Preservation Ordinance (1901), Rivers Ordinance (1903), Mining Rights and Regulations Ordinance (1925), Land Planning and Soil Erosion Ordinance (1953), which were amended upon independence in 1957. In the late 1990s, Ghana passed additional regulations related to the environment: The Environmental Protection Agency Act (1994), the Pesticides Control and Management Act (1996), and the Environmental Assessment Regulation (LI 1652, 1999). The Environmental Protection Agency Act formed Ghana's EPA in 1994, which broadened the objectives and responsibilities of the agency.

The Environmental Assessment Regulation (LI 1652) requires new and existing industries to consistently report on their environmental assessments to the EPA. The Environmental Assessment Regulation established procedures to evaluate the environmental impact on certain classes of activities, including agricultural activities, fishing and trapping, logging and forestry, forestry services, mining, crude oil and natural gas, quarries and sand pits, manufacturing (i.e., food, beverages, rubber, plastics, leather and allied products, textiles, wood, paper and allied products, etc.), primary metals, fabricated metal products, transportation equipment, non-metallic mineral products, including refined petroleum products, other manufacturing, construction, highways, utilities, etc. An EIA is mandatory under Ghanaian law for the following types of projects: airports, drainage and irrigation projects, land reclamation, fisheries, forestry, recreational development, waste treatment and disposal, water supply, and activities impacting environmental conservation and management. For warehousing, structures require a preliminary EIA under Ghanaian Environmental Law, and must be located in Industrial / Commercial Areas. Industrial estates with a footprint greater than 1 hectare (10,000 m2) require a preliminary EIA. Additionally, industrial estates require the development of a speculative industrial development when the site area is 10ha or more, or the development is within the aquifer protection zone. For irrigation and drainage projects, a preliminary EIA is required for lang drainage activities, and a full EIA is required for primary and secondary drains, surface-water and groundwater fed irrigation covering more than 500 ha, and development of canals, levees, and embankments.

Quality control and residue analysis laboratories have been established at the Ghana Atomic Agency Commission, and the Ghana Standards Board, the Environmental Protection Agency, the Cocobod and the Cocoa Research Institute of Ghana. Furthermore, Ghana is a signatory to all major international conventions and agreements relating to pesticides management such as PIC, The Code of Conduct on the Distribution and Use of Pesticides, the Intergovernmental Forum on Chemicals Safety of 1994, and The Intergovernmental Forum on Chemicals Safety II of 1997.

**Guinea**

The Guinean Forest, a biodiversity hotspot, regulator of the hydrological regime of the region's major rivers, and home to some of the last remaining western chimpanzee populations has been reduced by deforestation and illegal logging to an estimated 15 percent of its original cover;

- The region has lost between 21 and 50 percent of its mangrove cover in the last 30 years;
- The hydrologic regimes of the region's largest rivers are experiencing declines in volume
- flow that cannot be explained by variation in rainfall;
- Marine fisheries are over exploited and production is falling behind population

- growth, affecting long-term sustainability; and
- Wildlife poaching, trade and trafficking and over-harvesting of bushmeat continue despite efforts to control the problem.

It is widely accepted that healthy ecosystems and the services they provide are essential components of climate change adaptation and resilient natural and socio-economic systems. In West Africa coastal ecosystems and the Guinean Forest provide critical ecosystem services:

The regulation of the hydrological cycle by the Guinean Forest ecosystems, where many important West African rivers originate, is vital for the region's economy, food, security, transportation, peace, and hydropower generation. Hydrological models predict that deforestation of the upper reaches of the Niger watershed in the Guinean Forest region would result in a threefold increase in runoff even though that ecosystem occupies less than 5% of the entire watershed9. In West Africa, reliable hydrological flow regimes are crucial for regional peace. Over the past few years there have been disagreements over water between; Burkina Faso and Ghana, Senegal and Mauritania, Niger and Nigeria.10 Less predictable rainfall and the likelihood of increased frequency of extreme climatological events magnifies the importance of the Guinean Forest as a regulator of the hydrological cycle.

The Guinean Forests provides a plethora of non-timber forest products (NTFP) to local populations including up to 80 percent of animal household protein consumption, fuel, medicine, raw material for construction, honey, and a number of products for which there are emerging markets.

**Togo**

Togo Article 88 -14 of the Environmental Law of 3rd November 1988 currently constitutes the legislative instrument serving as a reference point for environmental management in the country[13]. To support the implementation of this law, the Togolese Government adopted the following environmental and natural resource management policies:

● The National Environmental Policy (December 1998);
● The National Environmental Action Plan (2001);
● The National Action Program for the fight against desertification;
● The National Communication on Climate Change (first publication in September 2001); and
● The National Strategy on Conservation and Sustainable use of Biodiversity (September 2003). That environmental policy framework provides a general orientation for all development partners for promoting a sustainable development perspective in all sectors.

The key orientation in the policy framework includes:
● An environmental assessment of all projects;
● Promotion of industrial technologies mindful of the environment and prudent/rational management of industrial waste;
● Supervision and control of emissions and disposal of pollutants into the atmosphere, water bodies and in the soil; and
● Factoring environmental costs into decision-making.

Article 15 of the Legal Framework on the Environment empowers the National Agency for Environmental Management (NAEM) to promote and implement a system of environmental evaluation,

[13] The Togo National Action Plan on Environment, 2001

notably environmental impact surveys, strategic environmental evaluations and environmental audits. In this capacity, the NAEM is responsible for coordinating and leading all environmental impact surveys, evaluations and reports as well as issuing environmental compliance certificates. Moreover, Article 12 of the Legal Framework creates the National Commission on Sustainable Development (NCSD) responsible for pursuing environmental integration in the development of sectoral policies and strategies. Finally, the Ministry of Health has a national medical waste management plan (2010-2014).

**Côte d'Ivoire**

The Environment Code, adopted in 1996, set up rules and procedures regarding the management of development activities and their impact on the environment. The Ministry of the Environment, Urban Sanitation and Sustainable Development (MINESUDD) is responsible for the implementation of the environment code, and also has the following responsibilities for protecting the environment:

● Planning and control of environmental policies, evaluations and plans;

● Managing and monitoring projects funded by the Global Environment Fund (GEF) and UNDP;

● Establishing and managing national parks and reserves, in coordination with the Ministries of Tourism and Forestry;

● Protection and development of aquatic ecosystems

● Coordinating the management of major natural disasters; and

● Monitoring industrial, agricultural, and toxic waste (with relevant ministries).

Article 39 of the Environment Code requires that all projects that might have a negative impact on the environment complete an Environmental Impact Assessment (EIA). The EIA must include a description of the proposed activities and environment likely to be affected; alternative solutions; and identification of mitigation measures and the cost of their implementation. Côte d'Ivoire is party to various international environmental agreements, including for biodiversity, climate change (Kyoto Protocol), endangered species, hazardous wastes, ozone layer protection, and wetlands.

**Cameroon**

Cameroon has a wide array of legislation aimed at minimizing the environmental impacts. Cameroon's Law No. 96/12 of 05/08/1996, describes the legal framework for environmental management in Cameroon, forming the basis for all environmental policies and includes steps for the reduction of greenhouse gas emissions. It states that:

● The environment constitutes a national common heritage in the Republic of Cameroon; and

● Its protection and the rational management of the resources it provides to human life are of general interest. Cameroonian environment, health and safety requirements. In no case may these requirements be less stringent than the minimum recommended practices for general construction health and safety, lead, and asbestos (Links to relevant Cameroonian regulations and summary of their content are available at the website of the International Labor Organization (ILO): https://www.ilo.org/dyn/legosh/en/f?p=14100:1100:0::NO::P1100_ISO_CODE3,P1100_YEAR:CMR,2014) . Safety and health at work is essentially governed by Title VI of the Labour Code entitled "Safety and Health at Work". The main OSH regulation besides Title VI of the Labour Code is the "arrêté n°039

/MTPS /IMT du 26 novembre 1984 fixant les mesures générales d'hygiène et de sécurité sur les lieux de travail" which contains: the regulations of the respective obligations of employers and workers, the composition of the hygiene and safety committees, the setting of general conditions of hygiene relating to, among other things, construction, ventilation, temperature and lighting, the determination of safety measures and transportation, the definition of hazardous substances and rules of prevention and fire fighting, the establishment of the means of control and sanctions.

Cameroon's Law No. 98/005 of 4/04/1998, describes the National Water Code, which specifies the conditions and restrictions concerning the use of water resources for industrial purposes as well as the conditions for the dumping of industrial waste in aquatic environments. Cameroon is also a part of the Convention on International Trade in Endangered Species of Wild Fauna and Flora. The country implemented a National Strategy and Wildlife Control Strategy to regulate trade and to manage and protect endangered species. Cameroon also ratified the UN treaty to combat desertification which has been implemented through a national plan.

## 2. CATEGORICAL EXCLUSION DETERMINATIONS

The actions leading to the Activity's proposed results are among the classes of actions listed in 22CFR216.2(c)(2) and have no foreseeable significant direct or indirect adverse effect on the environment. Therefore, under 22CFR216.2(c)(1), neither an IEE nor an EA will be required for these activities. Instead, a Categorical Exclusion is recommended for the projects activities 1-32 described above.

A categorical exclusion is recommended for the following sub-activities detailed in Table 1 per 22 CFR 216.2(c)(2):

- Sub-activities 1; 2; 3; 4; 5; 6; 7; 11; 12; 13; 14,15,16, 17, 18, 19 through 25; 27 and under §216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);
- Sub-activities 8; 10; under §216.2(c)(2)(ii) Controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas and carefully monitored;
- Sub-activities 20, 21, 22, 23, 24, 28; 29; 30; 31; 44, under §216.2(c)(2) (iii) Analyses, studies, academic or research workshops and meetings;
- Sub-activity 9 and 26 (except funding construction, business development where the business relies on natural resources) under §216.2(c)(2)(v) Document and information transfers;

## 3. ENVIRONMENTAL DETERMINATIONS, IMPACTS AND MITIGATIONS

The following section provides the mandatory analysis of impacts for all activities that are NOT Categorically Excluded per Section 2 of this IEE. As applicable, this section describes impacts that can be reasonably mitigated through details provided in this IEE (i.e., Negative Determination), those that may have significant impact and need further analysis (i.e., Positive Threshold Decision), and those for which details are not sufficient at this time and require review at a later time (i.e., Deferred Threshold Decision). The impacts and mitigations should be summarized in the appropriate tables below, but IEE writers are encouraged to include a narrative discussion of impacts and mitigations outside of the

summary table when such narrative would help the analysts and readers to understand the recommendations. Upon approval of this document, the determinations become affirmed, per Agency regulations (22 CFR 216).

Various projects and programs in the Regional Peace and Governance Office portfolio summarized above, will take advantage of small grants programs as a tool. The range of activities for which grants may be used are yet to be determined. However, these activities will be within the scope of activities described in this IEE. As such, the analysis set out in this section already examines the environmental impacts of activities to be supported with sub grants and sets out recommended determinations and conditions. This analysis applies equally whether the activities are to be conducted directly by a prime contractor/grantee, or via a sub grant mechanism. The general conditions of section 4, below, require that IPs impose these applicable IEE conditions on their sub grantees, require reporting on these conditions, and monitor their performance. Thus, no separate recommended determinations are necessary or appropriate for sub-grant activities.

## NEGATIVE DETERMINATION WITH CONDITIONS:

| Activities or Sub-activities | Potential Impacts | Mitigation Measures |
|---|---|---|
| Activity – 32, 33, 34, 36, 37, 38, and 39. | Construction itself has a well-known set of potential adverse impacts, which spans across nearly all types of construction, rehabilitation, and upgrading (e.g., housing structures, warehouses, health clinics, market infrastructure, agricultural markets, etc). They include the following:<br>● Disturbance to existing landscape/habitat. Construction typically necessitates clearing, grading, trenching and other actions that can result in near-complete disturbance to the pre-existing landscape/habitat within the plot or right-of-way. If the plot or right-of-way contains or is adjacent to a permanent or seasonal stream/water body, grading and leveling can disrupt local drainage.<br>● Sedimentation/fouling of surface waters. Runoff from cleared ground or materials stockpiles during construction can result in sedimentation/fouling of surface waters, particularly if the site is located in close proximity to a stream or water body.<br>● Standing water. Construction may result in standing water on-site, which readily becomes breeding habitat for mosquitoes and other disease vectors.<br>● Occupational and community health and safety hazards. The construction process and construction sites present a number of hazards: fall and crush injuries, hazards from hand or power tools and equipment used in construction, and exposure to hazardous substances, such as solvents in paint, cement dust, etc.<br>● Increased demand for water and production of sewage, manure, and waste waters. Community structures where people, livestock, or agricultural products are gathered are likely to locally increase the demand for water and sanitation facilities. For example, on market day, the need for toilets, fresh water, and areas to pen animals increase. Likewise, the amount of manure and sewage will increase on those days, and without adequate systems, groundwater and surface water can be contaminated, dust can be significant, and health hazards from zoonotic and diarrheal disease can increase.<br>● Increased air and noise pollution can result during construction or rehabilitation from the actions of construction equipment and workers.<br>● Adverse impacts of materials sourcing. Construction requires a set of materials often procured locally: timber, fill, sand and gravel, bricks. Unmanaged extraction of these materials can have | See conditions below.<br><br>Construction Conditions:<br><br>● NDwC for construction of new or rehabilitated facilities in which the total surface area disturbed is 1000 m2 (10,000 sq ft) or less and there are no complicating factors, as defined:<br>▪ The site is not within 30m of a permanent or seasonal stream or water body<br>▪ It will not involve displacement of existing settlement/inhabitants,<br>▪ It has an average slope of less than 5%,<br>▪ It is not heavily forested or not in an otherwise undisturbed local ecosystem<br>▪ It is not in a protected area.<br>▪ Sites violating one or more of these criteria are subject to additional determinations and conditions.<br>● Construction sites bigger than 1,000 sq m (10,000 sq ft) or more than $250,000 requires the A/COR and MEO to jointly consult with the AFR BEO for next steps. No implementation is allowed until the AFR BEO conditions are fully met.<br><br>**1.For all construction activities,** the site must not be within 30m of a permanent or seasonal stream or water body; will NOT involve displacement of existing settlement/inhabitants; has an average slope of less than five percent and is not heavily forested; and is in an otherwise undisturbed local ecosystem, or protected area. Sites not meeting one or more of these criteria are subject to the determinations and conditions for construction with a total surface area disturbed of 1000 $m^2$ OR MORE, as described in the following activity threshold determination.<br><br>**2. Construction** will be undertaken in a manner generally consistent with the guidance for environmentally sound construction, provided in the Small-Scale Construction chapter of the USAID Sector Environmental Guidelines https://www.usaid.gov/document/sector-environmental-guideline-construction-2017<br><br>At a minimum, (1) During construction, prevent sediment-heavy run-off from cleared site or material stockpiles to any surface waters or fields with berms, by covering sand/dirt piles, or by choice of location (Only applies if construction occurs during rainy season);<br>(2) Construction must be managed so that no standing water on the site persists more than 4 days;<br>(3) Implement erosion control methods during-construction and revegetate around the construction site to prevent erosion once construction is complete; |

| Activities or Sub-activities | Potential Impacts | Mitigation Measures |
|---|---|---|
| | adverse effects on the environment. For example, stream bed mining of sand or gravel can increase sedimentation and disturb sensitive ecosystems; or purchase of timber from unmanaged or illegal concessions helps drive deforestation.<br>● Use, storage and disposal of toxic materials. Numerous toxic chemicals play a significant role in the construction industry. These may vary depending on the type of construction. Termiticides and preservatives are used to treat wood. They can extend the life of wood and reduce waste of forest resources, but if improperly used may leach into nearby soils or water and touching treated wood may leave residues on exposed skin.<br>● Use of burnt bricks. Burnt (fired) bricks are a major cause of deforestation in Africa. The demand for burnt bricks in the construction industry has stimulated a huge demand for hardwood for burning the bricks. This demand is most severe in peri-urban areas.<br>● Potential disturbance of surfaces covered with leaded paint, generating hazardous lead-containing paint flakes and dust. These activities put those around the area at risk of lead poisoning by inhalation or ingestion.<br>Markets and transport yards (two key parts of "market infrastructure") have significant potential environmental and health impacts associated with their operation: In operation, these facilities generate significant quantities of wastewater and both human and organic wastes. If provisions for waste management are not part of the facility design and/or if these wastes are improperly managed, these wastes can contaminate water supplies and/or provide ready habitat for disease vectors such as flies, mosquitoes, and rats. The result is an increase in disease, particularly oral-fecal route diseases. | (4) Require general contractor to certify that it is not extracting fill, sand or gravel from waterways or ecologically sensitive areas, nor is it knowingly purchasing these materials from vendors who do so;<br>(5) Identify and implement any feasible measures to increase the probability that timber is procured from legal, well-managed sources; and,<br>(6) Conduct community and worker sensitization meetings related to reducing the social / cultural impact of construction on a community via adverse social behaviors, avoiding the disruption of cultural sites, noise minimization, and decreasing the spread of communicable diseases.<br><br>**3. Asbestos.** If the presence of Asbestos is suspected in a facility to be renovated, the facility must be tested for asbestos before rehabilitation works begin. Should asbestos be present, then the work must be carried out in conformity with host country requirements, (if any) and in conformity with guidance to be provided by the MEO, in consultation with the REA and BEO. All results of the testing for asbestos shall be communicated to the C/AOR.<br><br>**4. Paint.** No lead-based paint shall be used, when lead-free paint is used, it will be stored properly to avoid accidental spills or consumption by children; empty cans will be disposed of in an environmentally safe manner away from areas where contamination of water sources might occur; and the empty cans will be broken or punctured so that they cannot be reused as drinking or food containers.<br><br>**6. Water supplies and sanitation**. Where water supplies for drinking or other uses and sanitation facilities are upgraded or provided, good-practice design standards must be implemented for new construction and rehabilitation works, generally consistent with USAID's Sector Environmental Guidelines: Water Supply & Sanitation: https://www.usaid.gov/document/sector-environmental-guideline-water-supply-and-sanitation-2017<br><br>These standards must be specified in the EMMP.<br>For water supply, they must include siting of new wells well away from groundwater contamination sources (e.g. latrines, cesspits, and dumps), exclusion of livestock from water points, and prevention of standing water at water supply points.<br><br>A water quality assurance plan (WQAP) should specify how the IP will assure safe drinking water for the project and meet applicable partner-country water quality requirements given project implementation conditions.<br><br>**The formal AFR subproject/sub-grant review process**, as set out by the *AFR Environmental Review Form* (available here ) must be completed and approved prior to construction or rehabilitation of each site/system |
| | | |
| Activity – 40 and 41, 45. | *Support for post-harvest practices can have the following.*<br>*environmental impacts:* | ● Promote and implement sustainable farming techniques, like crop rotation, integrated pest |

| Activities or Sub-activities | Potential Impacts | Mitigation Measures |
|---|---|---|
| | ● *Agribusiness enterprises, particularly agricultural processing, can be the source of significant adverse environmental impacts. Assistance that increases the scale or number of such enterprises in the absence of such practices will tend to result in/increase these adverse impacts.*<br>● *Various food processing, handling, storing and packaging operations create wastes of different quality and quantity, which, if not treated, could lead to increasing disposal problems and severe pollution problems. Additionally, if not recovered by appropriate technologies for upgrading, bioconversion and reutilization, food processing wastes can represent a loss of valuable biomass and nutrients.*<br>● *Processing will likely result in the generation of organic wastes and potentially inorganic wastes. Hulls from shelling or off-casts from milling are solid wastes that must be handled appropriately. Additionally, spoiled products may need to be disposed of, in which case the spoiled products could be hazardous for human or animal consumption (e.g., aflatoxin contamination).*<br>*Properly processed, solid wastes can be converted into organic fertilizers.*<br>● *Liquid wastes from food washing and processing contain significant quantities of organic and inorganic matter. These wastes if improperly disposed can generate standing water that will become a breeding ground for disease vectors and when reaching groundwater and surface water can create pockets of pollution. The impact on the water will depend on wastewater characteristics, that usually greatly vary, but generally, water pollution can result in changes in water pH and temperature, increased nitrogen and phosphorus load that leads to eutrophication and more long-term problems because of organic compounds and heavy metals that are discharged.*<br>● *Processing, storage and transportation of agricultural produce requires energy and all energy consumption has an impact on the environment. Equipment such as pumps that are of poor quality have lower energy efficiency. Certain power sources, such as diesel generators, generate greenhouse gases and local air and noise pollution.*<br>● *As noted above, pesticide use, including for the protection of stored commodities (e.g., fumigation) can result in serious health implications to humans and contamination of the environment. Structural use of* | management, and organic farming, to minimize land and water degradation.<br>● Encourage diverse cropping systems and the use of indigenous crop varieties to maintain habitat diversity. Create buffer zones around agricultural fields to protect natural habitats.<br>● Limit the use of pesticides and herbicides, opting for biological control methods and eco-friendly alternatives to reduce harm to non-target species and ecosystems.<br>● Engage local communities in planning and decision-making processes. Provide fair compensation or alternative livelihood options if displacement or changes in traditional lifestyles are unavoidable.<br>● Ensure proper training and use of personal protective equipment (PPE) when handling agricultural machinery, pesticides, and chemicals. Promote safety standards and regular health check-ups for workers.<br>● The selection and demonstration of crops for cultivation should reflect local environmental conditions, with particular emphasis on the local terrain, biodiversity, future climate predictions, and quality and quantity of water and soil resources.<br>● All agricultural actions will include sensitization of partners, stakeholders and beneficiaries to climate risks of agriculture and required environmental safeguards.<br>● Where appropriate, the partner will promote environmental safeguards and climate adaptation for agricultural actions including, to the extent possible:<br>a. Avoid land clearance and removal of vegetation, with a preference for utilizing already cleared plots.<br>b. Where plots must be cleared, it will be done in an environmentally sustainable manner conserving vegetation and replanting trees.<br>c. Discourage agricultural actions within 30 meters of water bodies.<br>d. Plot sitting will take into consideration local social and cultural constructs and norms.<br>e. The use of chemical inputs should not be avoided on principle, but if synthetic inputs are to be promoted a pesticide safer use capacity building strategy should be supported by a package of marketing, quality improvement and value addition actions that can support the increased expense of input requirements.<br><br>All introductions of post-harvest technologies and use of machinery must be screened for environmental and social impacts over the lifetime use of equipment assessing its potential impacts on air, water, and soil pollution, labor safety and sustainability. |

| Activities or Sub-activities | Potential Impacts | Mitigation Measures |
|---|---|---|
| | *pesticides can pose significant risk to applicators and bystanders if not done properly and escaped fumigants can cause illness and death of workers and the public.*<br>*● Farmworkers and post-harvest food processors are exposed to numerous safety, health, environmental, biological, and respiratory hazards. These include heat exposure, falls, musculoskeletal injuries, hazardous equipment and machinery, unsanitary conditions, pesticides, and many others.*<br>*● Poor management and unsustainable agricultural practices can exacerbate land and water degradation.*<br>*● Intensive agricultural practices such as excessive tillage, overuse of chemical fertilizers, and monocropping can degrade soil quality and lead to a loss of biodiversity.*<br>*● Agricultural activities can contribute to water pollution through the excessive use of pesticides, herbicides, and fertilizers. These chemicals can leach into water bodies, contaminating groundwater and surface water and negatively affecting aquatic ecosystems.*<br>*● The expansion or intensification of agricultural activities can lead to displacement of local communities or changes in traditional ways of life.*<br>*● Increased risk to occupational health and safety, associated with the use of agricultural machinery, pesticides, and other chemicals.*<br>*● Agriculture can put pressure on water resources, leading to water scarcity in certain regions.*<br>*● Certain agricultural practices, such as the use of synthetic fertilizers, enteric fermentation from livestock, and the burning of agricultural residues, contribute to greenhouse gas emissions.*<br><br>*Properly managed, livestock production can enhance land and water quality, biodiversity, and social and economic well-being.*<br>*However, when improperly managed, livestock production may cause significant economic, social and environmental damage.*<br>*Livestock productions, in general, can be associated with the following environment impacts:*<br>*● Land degradation - Adverse impacts of livestock are associated with overgrazing and use of marginal lands, soil erosion and compaction, land degradation and diversification, loss of natural habitats and resulting losses of biodiversity.*<br>*● Loss of biodiversity - Breed has a strong influence on disease susceptibility and therefore on disease* | ● Development and support of value chains based on forest products will incorporate cleaner production and waste energy and water minimization best practices.<br>● All post-harvest actions where waste is generated will have a waste management plan.<br>● Support for micro and small-scale processing enterprises will follow guidelines outlined by the "Food processing resource efficient and cleaner production briefing and resource guide for Micro & Small Enterprises - https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/sector-environmental-guidelines-resources#ws<br><br>Refer to below Standard Condition PERSUAP, for any procurement and/or use of pesticides.<br><br>**PERSUAP**<br>All activities that fall outside of the category of controlled experimentation exclusively for the purpose of research and field evaluation and entail the procurement or use, or both, of pesticides shall conform with the PERSUAP, conducted in accordance with USAID Pesticide Procedures (22 CFR 216.3(b)). Such compliance normally requires preparation and approval of a package of two coordinated analyses: 1) a Programmatic PERSUAP for all USAID pesticide-using activities in a country; and 2) an Activity-level PERSUAP for each specific activity that proposes to use pesticides. No funds shall be obligated or expended for the procurement or use of pesticides unless they are specifically approved in the PERSUAP and the requirements for the Activity PERSUAP are met.<br><br>Refer to the USAID Sector Environmental Guideline for Crop Production and Dryland Agriculture for additional mitigation measure: https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/sector-environmental-guidelines-resources#cp |

| Activities or Sub-activities | Potential Impacts | Mitigation Measures |
|---|---|---|
| | *management. Systematic livestock production may result in loss of genetic diversity in livestock species and subsequent susceptibility to disease outbreaks. An uncontrolled introduction of new breeds could also cause a gradual disappearance of local pure breeds*<br>*● Water pollution - Contamination may occur if nutrients from manure enter the water table because they are either improperly used or disposed of. Water pollution can also be associated with improper processing and*<br>*disposal of dead animals that release nutrients into the ground water as they decompose. Animal manures transported from fields, pens or feedlots into water bodies through rainfall, runoff or irrigation can pollute local drinking water sources and spread human and*<br>*animal diseases.*<br>*● Air pollution - Livestock production can increase greenhouse gas emissions*<br>*● Social impacts - When policies do not consistently address the land tenure issue for farmers and pastoralists, livestock keepers may potentially increase animal stock beyond land carrying capacity, thus contributing to enhanced competition for resources,*<br>*● Spread of zoonotic disease is an infectious disease that is transmitted between species from animals to humans (or from humans to animals).*<br>*● Spread of invasive species* | |
| Activity 42 | *Improved management and equitable distribution of water resources - Water Allocation Conflicts –*<br>*Disputes may arise over how water is shared among users, especially during shortages.*<br>*● Marginalization of Communities may receive less water than needed, exacerbating inequalities.*<br>*● Changes in water management can affect local customs and livelihoods that depend on historical water use patterns.*<br><br>*Construction/rehabilitation/installation of impoundments for water facilities can have the following environmental*<br>*impacts:*<br>*● Poor design, operation and/or maintenance of water supply improvements can lead to pools of stagnant water near water taps, water pipes and storage tanks. Improper or ineffective practices for disposing of excreta and solid waste can exacerbate this problem. Stagnant water pools form an excellent breeding place for disease vectors (mosquitoes that carry malaria, etc.), and* | Improved management and equitable distribution of water resources<br>Set limits on water extraction to match the sustainable yield of aquifers and encourage the collection of rainwater.<br>● Maintain environmental flow regimes to preserve aquatic ecosystem health and water quality.<br>● Enhance wastewater treatment infrastructure and establish safe water reuse protocols to mitigate pollution.<br>● Conduct consultations with stakeholders to formulate equitable water distribution policies that consider the needs of humans, particularly vulnerable populations, alongside ecological considerations.<br>● Actively involve community members in planning and decision-making to ensure equitable access to water and the conservation of local customs.<br>● Tailor water management strategies to be congruent with indigenous traditions and sustainable practices.<br><br>*Construction/rehabilitation/installation of impoundments for water facilities*<br><br>Construction Conditions: |

| Activities or Sub-activities | Potential Impacts | Mitigation Measures |
|---|---|---|
| | *surface water impoundments for household non-potable uses may be especially challenging to manage. They can also increase transmission of water- related diseases, especially when exchange of water is low or in other cases, during high rainfall, they may capture solid waste or excreta as runoff.*<br>● *Adverse impacts to ecosystems can arise from water diversion, construction, or decommissioning actions in or near a watercourse, or from fecal contamination of water. Numerous impacts on ecosystems are possible including the following: i) construction of facilities in sensitive areas; ii) improperly designed water-supply projects that deplete fresh water, erode soil from pipe leakage, or create poor drainage at taps; and iii) contamination of receiving waters with human excreta or animal manure.*<br>● *Depletion of freshwater sources can occur when projects do not adequately assess the quantity of available surface and groundwater (including typical seasonal and annual variations.) These assessments need to take into account future changes in temperature and rainfall due to climate change. Other causes include poor mechanisms for regulating withdrawals and use of water, and insufficient monitoring and maintenance of leaks.* | ● NDwC for construction of new or rehabilitated facilities in which the total surface area disturbed is 1000 m2 (10,000 sq ft) or less and there are no complicating factors, as defined:<br>▪ The site is not within 30m of a permanent or seasonal stream or water body<br>▪ It will not involve displacement of existing settlement/inhabitants,<br>▪ It has an average slope of less than 5%,<br>▪ It is not heavily forested or not in an otherwise undisturbed local ecosystem<br>▪ It is not in a protected area.<br>▪ Sites violating one or more of these criteria are subject to additional determinations and conditions.<br>Construction sites bigger than 1,000 sq m (10,000 sq ft) or more than $250,000 requires the A/COR and MEO to jointly consult with the AFR BEO for next steps. No implementation is allowed until the AFR BEO conditions are fully met<br><br>● The awardee/IP engaged in construction of boreholes will ensure environmentally sound design by skilled professionals and actionable mitigation at every phase of construction, as provided in USAID Sector Environmental Guideline for Water Supply and Sanitation: https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices<br>● Prior to borehole drilling and water extraction, the IPs or their designated contractors, must obtain all required applicable authorizations, licenses and permits from the local authorities.<br>● Water withdrawn cannot exceed recharge rates to avoid lowering the water table and decreasing yields in neighboring boreholes. The water availability must be assessed in the context of future climate scenarios (including temperature changes and rainfall conditions) over the expected life of the borehole. The design of the borehole will be altered as appropriate and adaptation measures proposed if the expected yield is insufficient over the lifetime of the borehole (e.g., watershed reforestation). A survey and/or consultation with a hydrologist may be required.<br>● Boreholes must be properly sited and located away (up slope and at least 50m) from sources of contamination, such as latrines or poorly drained areas which receive contaminated run-off and away from other sources of abstraction.<br>● Water Quality Assurance Plan: Prior to implementing projects which include the provision of drinking water, the implementing partner will prepare and receive approval for a Water Quality Assurance Plan (WQAP). The purpose of the WQAP is to ensure that all new and rehabilitated USAID-funded sources of drinking water are safe for human consumption. |

| Activities or Sub-activities | Potential Impacts | Mitigation Measures |
|---|---|---|
| | | ● The WQAP will be developed in consultation with the cognizant AOR/COR and/or Activity Manager, and approved by the AOR/COR, Activity Manager, MEO, and REA. The WQAP should be shared with the BEO for cognizance as part of the clearance process.<br>● The WQAP should include the following:<br>Description of host-country and USAID water quality standards<br>Initial testing schedule for newly constructed or rehabilitated water points, and an ongoing monitoring schedule for all water points.<br><br>Assessment of equipment, resources, and expertise that will be required to monitor and report on compliance with water quality standards (for example, sampling materials, reagents, transportation, storage, laboratory facilities and capacity, communications, training or certification criteria, etc)<br><br>Corrective measures in the case of quality exceedances<br>Plan for training and stakeholder participation to assure long-term operational sustainability of the water points.<br><br>The WQAP should follow any applicable USAID guidance, as well as local laws, regulations and policies.<br>Once approved, the WQAP must be implemented in full, and for the duration of drinking water activities. The document should be uploaded to the Mission's folder within the AFR EC Document Library. For preparation of the WQAP, refer to the WQAP template and guidance document here:<br><br>https://www.usaid.gov/environmental-procedures/environmental-compliance-esdm-program-cycle/special-compliance-topics/water/wqap-africa-guidance-note<br><br>● Involve local communities in the planning and decision-making process for water impoundment projects.<br>● Encourage community participation in project design, location selection, and implementation.<br>● Ensure equitable access to impoundments, giving priority to vulnerable and marginalized groups.<br>● Implement measures to prevent exclusion and discrimination in water access.<br>● Promote gender equality by actively involving women in project planning and management. |
| Activity 43 and 46 | *The use of pesticides can result in serious implications to human health and contamination of the environment:* | A PERSUAP will be completed prior to undertaking activities. Distribution of kits and equipment will be accompanied by training with instructions on handling wastes (e.g., oils and solvents). The Contractor will be |

| Activities or Sub-activities | Potential Impacts | Mitigation Measures |
|---|---|---|
| | ● *There is now overwhelming evidence that pesticides pose a potential risk to humans and other life forms and unwanted side effects to the environment.*<br>● *Pesticide poisoning can cause deaths and chronic diseases.*<br>● *Pesticides can pollute the tissues of virtually every plant and animal life form on the earth and every natural resource including the air, water, soil and sediment in rivers.*<br>● *The high-risk groups exposed to pesticides include agricultural farm workers, but pesticides also affect agricultural food consumers and the public that is exposed to pesticides in the environment, for example, through inadequate notification of pesticide application.* | asked to develop to ensure appropriate training during provision of these products.<br><br>Refer to below Standard Condition PERSUAP, for any procurement and/or use of pesticides.<br><br>**PERSUAP**<br>All activities that fall outside of the category of controlled experimentation exclusively for the purpose of research and field evaluation and entail the procurement or use, or both, of pesticides shall conform with the PERSUAP, conducted in accordance with USAID Pesticide Procedures (22 CFR 216.3(b)). Such compliance normally requires preparation and approval of a package of two coordinated analyses: 1) a Programmatic PERSUAP for all USAID pesticide-using activities in a country; and 2) an Activity-level PERSUAP for each specific activity that proposes to use pesticides. No funds shall be obligated or expended for the procurement or use of pesticides unless they are specifically approved in the PERSUAP and the requirements for the Activity PERSUAP are met. |
| Activity 47 | ● *Improper processing and disposal of electronic equipment at the end of life may pose many human health and environmental risks - Human Health Impacts, Direct and indirect exposure, Children and pregnant women are the most vulnerable*<br><br>*E-waste exposure may be linked to: Adverse birth outcomes*<br><br>*Impaired learning and behavioral outcomes Increased risks of chronic diseases*<br><br>*Environmental Impacts - Toxic materials leaching into the environment can impact freshwater resources, contaminate crops, and threaten ecosystem health and biodiversity*<br><br>Electronic waste or e-waste includes discarded electronic appliances such as computers, printers, mobile phones, etc. E-waste contains valuable metals as well as potential contaminants that are harmful to the environment such as Pb, Sb, Hg, Cd, Ni, polybrominated diphenyl ethers (PBDEs), and polychlorinated biphenyls (PCBs). Burning e-waste generates other environmental contaminants. Recycling techniques in underdeveloped countries may include burning and dissolution in strong acids with few measures taken to prevent public health and environmental pollution. These effects can be severe and cause migration of communities near the contaminated water and food chains. Skin contact and inhalation for e-waste workers can lead to health problems. Smoke, dust, drinking water and food contamination for the wider community can also lead to health problems. Agricultural and | Typical planning and logistical considerations will include safe disposition of the commodities to the beneficiary and the beneficiary's plan for handling, storage, and, as these supplies and equipment will degrade over time, they must be disposed of properly at the end of their life.<br><br>Best Practices and Guidelines for e waste disposal will be followed for e-waste factsheet.<br><br>E-waste disposal should be employed as a last resort.<br><br>These activities must incorporate good-practice design standards generally consistent with USAID's Sector Environmental Guidelines: Soild Waste found at https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/sector-environmental-guidelines-resources#ms. |

| Activities or Sub-activities | Potential Impacts | Mitigation Measures |
|---|---|---|
| | manufactured products can be contaminated with poorly managed e-waste.<br><br>All activities that purchase electronics such as computers, printers, and mobile phones may have a negative impact on the environment. | |
| Activity 48 | Installation of solar power can have the following environmental impacts:<br>● Potential for negative impacts on the environment due to improper equipment lifecycle management and waste disposal.<br>● Hazardous waste from battery storage and disposal and from the disposal of solar panels.<br>● The siting of proposed solar PV structures and support structures (i.e.,fencing, and battery storage compartments) could be placed in high biodiversity or otherwise ecologically important areas<br>● Environmental degradation and loss of natural habitat.<br>● Improper decommissioning of solar PVs and batteries could result in improper waste disposal of solar PVs and components<br>● Improper siting of solar PV structures could result in the relocation of existing communal social structures<br>● Improper siting of PV structures and associated infrastructure could be in violation of local and national land use regulations. | Work plans must include: 1) parameters for minimizing environmental impact during siting of field sites, 2) a means for handling of wastes generated by decommissioning with the objective to recycle or reuse components, and 3) disposal of solid wastes generated from assembly or installation.<br><br>● As the availability and technology costs are shifting in favor of lithium-ion batteries, companies will explore the cost effectiveness of their use, which will help decrease the number of batteries needed (due to their longer durability) and risk of lead contamination.<br><br>● Technical assistance will be provided to include sharing of best practices to address handling and management of hazardous waste.<br><br>● Customer service will be provided by IPs to help customers conduct maintenance on their home off-grid solar systems which will help increase the life of the system.<br><br>● Develop training materials for assembly persons and installers that include aspects of general job site safety (e.g., electrical safety), reporting accidents, PPE use, code of conduct in the workplace and with customers.<br>– If an industry or country certification or licensing is necessary, ensure installers are certified or trained with both technical capacity and appropriate professional conduct standards.<br>– Ensure safety of customers at home and prevent gender-based violence (GBV) by 1) sharing appropriate conduct standards for installers entering homes, 2) requiring sexual harassment policies to be written into sub-contracts, and 3) creating a mechanism to report inappropriate behaviors.<br>– Empower women by providing opportunities for women to be trained as technicians.<br><br>Refer to the USAID Sector Environmental Guideline for Small- scale Energy: https://www.usaid.gov/environmental procedures/sectoral-environmental-social-bestpractices/sector-environmental-guidelines-resources#ws<br><br>● IPs will consult with stakeholders and community authorities to ensure a sustainable and autonomous supply to all. |

# 4. MANAGEMENT AND REPORTING ON REGULATION 216 PROCESS

## 4.1. USAID IMPLEMENTATION AND MONITORING REQUIREMENTS FOR AWARDS

The environmental determinations in this IEE are contingent upon full implementation of the following general implementation and monitoring requirements, as well as ADS 204 and other relevant requirements.

Changes to scope or addition to awards, per 22 CFR 216.3(a)(9), require a determination be made as to whether such change may have an environmental impact not previously assessed. Per ADS 204, it is the responsibility of the USAID A/COR to keep the MEO/REA and BEO informed of any new information or changes in the activity(ies) subject to this IEE that might require revision of this environmental analysis and environmental determination.

### 4.1.1. During Pre-Award:

4.1.1.1. Pre-Award Briefings: As feasible, the design team and/or the cognizant environmental officer(s) (e.g., MEO, REA, BEO) will provide a pre-award briefing for potential offerors on environmental compliance expectations/responsibilities at bidders' conferences.

4.1.1.2. Solicitations: The design team, in coordination with the A/CO, will ensure solicitations include environmental compliance requirements and evaluation criteria. A/CO will ensure technical and cost proposal requirements include approach, staffing, and budget sufficient for complying with the terms of this IEE.

4.1.1.3. Awards: The A/COR, in coordination with the A/CO, will ensure all awards and sub-awards, include environmental compliance requirements

### 4.1.2. During Post-Award:

4.1.2.1. Post-Award Briefings: The A/COR and/or the cognizant environmental officer(s) (e.g., MEO, REA, BEO) will provide post-award briefings for the IP on environmental compliance responsibilities.

4.1.2.2. Work Plans and Budgeting: The A/COR will ensure the IP integrates environmental compliance requirements in work plans and budgets to comply with requirements, including EMMP implementation and monitoring.

4.1.2.3. Staffing: The A/COR, in coordination with the IP, will ensure all awards have staffing capacity to implement environmental compliance requirements.

4.1.2.4. Records Management: The A/COR will maintain environmental compliance documents in the official project/activity file and upload records to the designated USAID environmental compliance database system.

4.1.2.5. Host Country Environmental Compliance: The A/COR will ensure the IP complies with applicable and appropriate host country environmental requirements unless otherwise directed in writing by USAID. However, in the case of a conflict between the host country and USAID requirements, the more stringent shall govern.

4.1.2.6. Work Plan Review: The A/COR will ensure the IP verifies, at least annually or when activities are added or modified, that activities remain within the scope of

the IEE. Activities outside of the scope of the IEE cannot be implemented until the IEE is amended.

4.1.2.7. IEE Amendment: If new activities are introduced or other changes to the scope of this IEE occur, an IEE Amendment will be required.

4.1.2.8. USAID Monitoring Oversight: The A/COR or designee, with the support of the cognizant environmental officer(s) (e.g., MEO, REA, BEO), will ensure monitoring of compliance with established requirements (e.g., by desktop reviews, site visits, etc.).

4.1.2.9. Environmental Compliance Mitigation and Monitoring Plan: The A/COR will ensure the IP develops, obtains approval for, and implements Environmental Mitigation and Monitoring Plans (EMMPs) that are responsive to the stipulated environmental compliance requirements.

4.1.2.10. Environmental Compliance Reporting: The A/COR will ensure the IP includes environmental compliance in regular project/activity reports, using indicators as appropriate; develops and submits the Environmental Mitigation and Monitoring Reports (EMMRs); and completes and submits a Record of Compliance (RoC) describing their implementation of EMMP requirements in conjunction with the final EMMR or at the close of sub activities (as applicable). And where required by Bureaus or Missions, ensure the IP prepares a closeout plan consistent with contract documentation for A/COR review and approval that outlines responsibilities for end-of-project operation, the transition of other operational responsibilities, and final EMMR with lessons learned.

4.1.2.11. Corrective Action: When noncompliance or unforeseen impacts are identified, IPs notify the A/COR, place a hold on activities, take corrective action, and report on the effectiveness of corrective actions. The A/COR initiates the corrective action process and ensures the IP completes and documents their activities. Where required by Bureaus or Missions, ensure Record of Compliance is completed.

## 4.2. SPECIAL INSTRUCTIONS FOR ENVIRONMENTAL COMPLIANCE

**4.2.1.** Other Supplemental Analyses: The A/COR will ensure supplemental environmental analyses that are called for in the IEE are completed and documented.

**4.2.2.** Sub-award Screening: The A/COR will ensure the IP uses an adequate environmental screening tool to screen any sub-award applications and to aid in the development of EMMPs.

**4.2.3.** The A/COR will ensure compliance with ADS Reference 200mbe for any activities involving human subjects in research supported by USAID.

**4.2.4.** The A/COR will ensure compliance with ADS Chapter 312 and ADS 312mad Federal Fertilizer Guidance for procurement and use of fertilizers.

https://ecd.usaid.gov/document.php?doc_id=62164

**ATTACHMENTS:** Annex 1: Climate Risk Management Summary and Table

# ANNEX 1. CLIMATE RISK MANAGEMENT

## ANNEX 1A. CLIMATE RISK MANAGEMENT SUMMARY

This section summarizes the methodology used and findings of the CRM Screening, in accordance with ADS 201mal. The design team, in consultation with the CIL, considered the potential effect of climate risks/stressors on the sustainability of the activity (changing precipitation patterns, rising temperature, floods, droughts, fires, landslides, etc.) in addition to the impact of activities on the climate (increased greenhouse gas emissions, land use changes, etc.).

Engineering analysis preceding design activities must include consideration of climate change and its potential impacts on the location (siting), functionality and sustainability of resulting infrastructure and infrastructure services. Such analysis must include identification of relevant data sets and gaps, review of local building standards and codes for adequacy; and determination of safety factors or other measures of uncertainty that will be carried through design. The results of this analysis, including risks identified and how they are addressed, shall be documented.

Climate considerations will be included in work plan development, and shared with the IP, including in solicitations, to help address climate risks.

ANNEX 1B. CLIMATE RISK MANAGEMENT SUMMARY TABLE

| **Activity**[14] | **Climate Risks**[15] | **Risk Rating**[16] | **How Risks are Addressed at Project Level**[17] | **Further Analysis and Actions for Activity Design/ Implementation**[18] | **Opportunities to Strengthen Climate Resilience or Climate Mitigation**[19] |
|---|---|---|---|---|---|
| Conflict Prevention and Mitigation activities<br><br>Prevention/Countering violent Extremism activities across West Africa<br><br>Democracy, Human Rights and Governance activities | Increasing rainfall and temperature conditions could prevent the conduct of community meetings and other planned activities<br><br>Increased rainfall variability and temperature may result in decreased water availability and increased demand for and competition over limited water and other natural resources, causing or exacerbating conflict, especially during periods of drought.<br><br>Changing climatic conditions could induce migration of people looking for livelihoods, including changing patterns for seasonal | MEDIUM | N/A: we do not have a project level design document. | Seasonal rain/weather conditions should be considered to ensure project goals are reached<br><br>Plan to accommodate any scheduled disruptions due to extreme weather conditions<br><br>Consider integrating messages and interventions related to climate risk management when developing strategies<br>Use of climate date to forecast seasonal water availability<br><br>Add greater consideration and response to the impacts of temporary or permanent migration on community cohesion, likelihoods, and conflict. | Work with local communities and partners to raise awareness about climate risks;<br><br>Identify opportunities for reducing the risk of resource-related conflict: coordinating and working with traditional governance systems that include conflict resolution processes.<br><br>Enhance local governance systems to incorporate voices of climate migrants and transhumants. |

[14] Purpose/Sub-purpose, Area of Focus, or Activity/ Mechanism, etc.
[15] List key risks related to the project elements identified through either the strategy- or project-level climate risk assessment.
[16] Low/Moderate/ High
[17] Describe how risks have been addressed at the project level. If a decision has been made to accept the risk, briefly explain why.
[18] Describe CRM measures to be integrated into activity design or implementation, including additional analysis, if applicable.
[19] Describe opportunities to achieve development objectives by integrating climate resilience or mitigation measures.

| | | | | | |
|---|---|---|---|---|---|
| | transhumance and herder movements | | | | |
| Construction and rehabilitation of individual markets, youth centers, rehabilitation of community centers, schools, transport yards<br><br>Small-Scale New Construction or Repair and Rehabilitation of Public Facilities and Spaces<br><br>Small scale construction or rehabilitation not in the presence of complicating factors (construction of new sources of potable | Increase in frequency and severity of extreme rainfall events and flooding may damage or reduce the lifespan of infrastructure. | MEDIUM | N/A we do not have a project design document | Construction will follow engineering design and use the most up-to-date information about how the climate is changing over the long-term to make construction site decisions.<br><br>Follow good practice and design standards for water and sanitation that consider future climate impacts, such as increased temperatures and increases intensity of storms.<br><br>Include climate change experts on any required Environmental Impact Assessments.<br>Include the following language in the solicitation and award: Engineering analysis preceding design activities must include consideration of climate change and its potential impacts on the | Work with partners on ecologically sound and climate resilient practices and approaches such as reforestation and watershed protection. Solar panels could be used for electricity while simultaneously limiting GHG emissions, and potentially lowering |

| | | | | | |
|---|---|---|---|---|---|
| water or new sewer systems[20]) | | | | location (siting), functionality, and sustainability of resulting infrastructure and infrastructure services. Such analysis must include identification of relevant data sets and gaps, review of local building standards and codes for adequacy, and determination of safety factors or other measures of uncertainty that will be carried through design. The results of this analysis, including risks identified and how they are addressed, shall be documented | energy costs |
| Small-Scale Agricultural Activities: activities may include technical and operational support for developing and strengthening small-scale agriculture inclusive of livestock, dairy production, crop production, poultry, and beekeeping, and training on modern | Increased rainfall variability and temperature may result in decreased water availability and increased demand for and competition over limited water and other natural resources, causing or exacerbating conflict, especially during periods of drought. | High | N/A we do not have a project design document | Seasonal rain/weather conditions should be considered to ensure project goals are reached<br><br>Plan to accommodate any scheduled disruptions due to extreme weather conditions<br><br>Consider integrating messages and interventions related to climate risk management when developing strategies | Support agricultural activities which are less exposed to climate risk, and are more climate-resilient.<br><br>Promote climate adaptive practices in agricultural and livestock activities, for example: solar powered refrigeration of dairy products, use of drought tolerant seeds, irrigation, use of shade trees, access to weather data and seasonal forecasts. |

20 Sites with no complicating factors are:
- Not within 30m of a permanent or seasonal stream or water body;
- Do not involve displacement of existing settlement/inhabitants;
- Have an average slope of less than 5%;
- Not heavily forested, or in an otherwise undisturbed local ecosystem, or in a protected area;
- Disturbed area of no greater than 1,000 sq meters or 10 km (for rural feeder roads);
- sLess than $250,000 total construction costs.

| | | | | | |
|---|---|---|---|---|---|
| farming techniques | Climate impacts may reduce agricultural and livestock productivity, even to the extent of forcing certain crops to be abandoned. The resulting food insecurity and livelihood loss may be destabilizing and increase pressure for individuals to pursue illegal sources of income.<br><br>Climate changes may impact the distribution of crop and livestock pests and diseases, requiring changes in use of pesticides and veterinary products. | | | Use of climate data to forecast seasonal water availability. Proactively analyze the viability of agricultural and livestock commodities to determine which are less exposed to climate risks.<br><br>Analyze the potential for climate-induced changes to distributions and severity of crop and livestock pests and diseases, and determine if this could affect the use of pesticides and livestock veterinary products. | If pest and disease burdens are projected to change, consider supporting activities to address those risks, such as safe pesticide uses, animal vaccination campaigns, integrated pest management, etc. Will need an approved PERSUAP. |