

**United States Agency for International Development  
Bureau of Democracy, Conflict and Humanitarian Assistance  
Office of Food for Peace**

**Initial Environmental Examination Guidance and  
Compliance Information for Title II Programs**

**I. Background and Purpose**

All awards funded by United States Agency for International Development (USAID) must conform to [22 C.F.R. 216, \*Environmental Procedures\*](#), to ensure that environmental factors and values are integrated into the USAID decision-making process. 22 C.F.R. 216, henceforward referred to as “USAID Regulation 216”, also assigns responsibility within USAID for assessing the environmental effects of USAID actions; they are consistent with [Executive Order 12114, \*Environmental Effects Abroad of Major Federal Actions\*](#), issued January 4, 1979, and the purposes of the [National Environmental Policy Act \(NEPA\)](#) of 1970, as amended (42 U.S.C. 4371 et seq.). Regulation 216 implements the requirements of NEPA as they affect USAID programs.

Through development of the Initial Environmental Examination (IEE), USAID Regulation 216 ensures that environmental (i.e., natural resource or public health) impacts of USAID-funded activities are identified and mitigation measures proposed at the design stage prior to the irreversible obligation of USAID funds. Subsequently, over the life of the award (LOA), these environmental mitigation measures are a standard component of program management.

To resolve or clarify specific issues, applicants and awardees should communicate with the agreement officer’s representative (AOR) in Food for Peace/Washington (FFP/W), the designated officer in the FFP/Missions and/or Regional Office, as appropriate (FFP/M/R) and the Democracy, Conflict and Humanitarian Assistance Bureau Environmental Officer (DCHA/BEO) in Washington. For appropriate environmental officer contacts, please refer to the [USAID Environmental Compliance Officers](#) website.

**II. Requirements Initial Environmental Examination**

**1. Development Food Assistance Programs**

A clear and concise presentation including important activities, monitoring and mitigation strategies, environmental management forms and associated maps and photos may be 15-20 pages in length. Applicants should include a matrix or table, outlining proposed mitigation plans. It is recommended that the applicant provide quantitative data, insert compressed, digital photos (~96 dpi, web/screen resolution), and/or qualitative narratives. The IEE is reviewed separately from the main development food assistance program proposal; any submissions related to the IEE should therefore be included with the IEE as a single digital document.

Compliance with USAID Regulation 216 is required of all Title II multi-year development activities, whether they are supported by section 202(e) funds, ITSH funds, monetization proceeds or program income.

Per USAID Regulation 216, costs for environmental mitigation measures for relevant technical sectors must be described.

Refer to [USAID Regulation 216](#) for further details on USAID environmental requirements. The [FFP Environment](#) website, the [Environmentally Sound Design and Management Capacity Building for Partners and Programs in Africa](#) website and the [Environmental Procedures Training Manual](#) also provide useful information and tools. Applicants should contact the [DCHA/BEO](#) with questions and/or comments concerning environmental compliance guidance, document preparation or capacity building opportunities.

- A. *Social Impact Assessment:* It is important to consider the social equity or distribution of impacts across different populations in the IEE. Just as the biophysical sections of IEEs devote attention to threatened or vulnerable landscapes, the IEE must also devote attention to the impacts on vulnerable segments of the human population. Examples include the poor, the elderly, adolescents, the unemployed, and women; members of the minority and/or other groups that are racially, ethnically, or culturally distinctive; or occupational, cultural, political, or value-based groups for whom a given community, region, or use of the biophysical environment is particularly important.
- B. *Environmental Management Forms:* As a means of presenting the management plan to mitigate potential impacts for a series of planned activities, an environmental management form is highly recommended. A management form may contain a list of activities, potential impacts, mitigation, monitoring with suggested indicators. Applicants may use the format suggested in *Tab 1: Identification of Mitigation Plan*, an attachment to this document.

*Tab 2: Environmental Monitoring and Evaluation Tracking Table*, an attachment to this document, provides an example monitoring and evaluation (M&E) table template to demonstrate the “status” of the environmental indicator over the (LOA using standard M&E procedures of separating results by output, outcome and performance indicators to be measured annually (output) and during baseline, mid-term and final evaluation studies (outcome and performance).

- C. *Monitoring and Evaluation:* All activities in the technical sectors of sustainable agricultural production and natural resources management, health and nutrition, water and sanitation, any cross-cutting issues with environmental impact and any activities related to distribution of food aid commodities and/or physical infrastructure development should describe how the environmental impact will be monitored and viable indicators should be suggested. Also, applicants should discuss whether the environmental effects will be part of the proposed food aid program’s overall M&E system (i.e., in the proposed indicator performance tracking table

submitted with the food aid program proposal) and, if so, whether annual and performance indicators have been developed. Funding should be specified for M&E for any environmental impacts of activities anticipated to be classified as “negative determination with conditions”.

An environmental management plan (EMP) would specify how this environmental impact M&E budget would adaptively manage the effectiveness of mitigation strategies for biophysical interventions that may have a negative impact on the environment (i.e. public health and/or ecological services). Refer to the *Environmental Procedures Training Manual* (March 2002), for information on EMPs.

*D. Budgeting for Environmental Compliance:* Applicants should ensure that all necessary funding for environmental mitigation measures specified in the IEE and in *Tab 1: Identification of Mitigation Plan* is requested in the proposed food aid program budget. Proposed funds for environmental mitigation should be included in the comprehensive and detailed budgets. These costs should be explained and justified in the budget narrative. The following non-exhaustive list provides examples of activities that may be included for funding under environmental mitigation in the proposed budget:

- Staff training, including both internal trainings and external and/or international workshops, conferences, seminars, etc.;
- Capacity building;
- Biophysical infrastructure and/or construction materials;
- Mitigation and monitoring; and
- Periodic environmental consulting.

Applicants are also highly encouraged to incorporate cost sharing for trainings related to environmental compliance and mitigation.

## 2. Emergency Food Assistance Programs

The IEE process must be invoked for slow-onset and persistent or complex emergencies as these interventions typically last more than one year. IEE is not required for a rapid-onset emergency funded by Emergency Food Assistance Programs. Points of clarification for the Emergency IEE requirements are found below and summarized in the *Decision Matrix of Requirements for Submission of Emergency Food Assistance Programs Initial Environmental Examinations* table below.

For rapid-onset emergencies, applicants are recommended to use the [rapid environmental assessment \(REA\)](#) approach. An REA is a human-centered, consensus-based approach to minimize environmental impact during a relief intervention. For more information regarding conducting an REA, please refer to [Guidelines for Rapid Environmental Impact Assessment in Disasters](#) and the [Sphere Humanitarian Charter and Minimum Standards in Disaster Response](#)

*Handbook (2011)*, paying particular attention to fuelwood consumption issues during direct distribution of food aid commodities.

This policy applies only to food aid programs implemented by private voluntary organizations, not those issued by public intergovernmental organizations such as the World Food Program (WFP). WFP environmental protection procedures are outlined in *WFP and the Environment: Issues and Priorities* (1998).

- For unpredictable emergencies that also have a rapid-onset (e.g. hurricane, conflict outbreak), the IEE is not required in the first year of implementation. The IEE would be required if there is a second year of Emergency funding (see *Decision Matrix of Requirements for Submission of Emergency Food Assistance Programs Initial Environmental Examination*).
- For more predictable a) slow-onset (e.g. drought) and/or b) persistent, complex (e.g. post-conflict rehabilitation, conflict support, safety nets) emergencies, where the applicant would be operating for the first time with a new population and under a set of new activities, the IEE is NOT required in the first year of the Emergency Program. The IEE will be required if an applicant prepares a subsequent Emergency Program, given that these types of humanitarian assistance responses typically persist for more than one year (see *Decision Matrix of Requirements for Submission of Emergency Food Assistance Program Initial Environmental Examination*).
- If the applicant submits an Emergency Program for a more predictable emergency when they have had previous experience or a food aid program with the same population, including other USAID funding (e.g., as a subcontractor to World Food Program), then the Emergency Program IEE is required whether the awardee plans to implement direct distribution of food aid commodities or food for work activities. This caveat does not apply to a rapid-onset emergency, given the unpredictability of on-the-ground operations.

#### **Decision Matrix of Requirements for Submission of Emergency Food Assistance Program Initial Environmental Examination**

Emergency Type	Applicant has Prior Host Country Experience?		IEE Required? Year 1	IEE Required? Year 2
	Yes or No	What activity type?		
Rapid-Onset	No	NA	No	Yes
	Yes	Direct Distribution	No	Yes
	Yes	Food for Work	No	Yes
Slow-Onset or Persistent, Complex	No	NA	No	Yes
	Yes	Direct Distribution	Yes (for Direct Distribution or Food for Work*)	Yes

	Yes	Food for Work	Yes	Yes
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\* An IEE is required in this scenario given greater risks associated with Food for Work activities and the need for expertise during implementation coupled with the more predictable slow-onset/complex situation on the ground.

### III. Submission and Clearances

Applicants must submit an IEE with their proposal submission to report on the environmental mitigation measures outlined in the proposed food aid program. Applicants should use the templates provided in this document and submit the IEE by the due date of the development food assistance program proposal.

Both FFP/W and FFP/M/R clearances are required for the IEE. However, all USAID Regulation 216 compliance documentation is prepared for the final decision and approval of the DCHA/BEO as referenced in Automated Directives Systems (ADS) 204, [Environmental Procedures](#), section 204.3.4a(3).

FFP/M/R may request revisions to the IEE to ensure that objectives, consideration of local conditions and consistency with environmental documentation of other awardees in the same host country are achieved. For this reason, the IEE must first be cleared by FFP/M/R. Clearance is mandatory from the FFP/M/R environmental officer, FFP Officer and director. Upon receipt of approval from FFP/M/R, AORs are responsible for ensuring that all USAID Regulation 216 documentations are submitted to the AO and the DCHA/BEO. In sum, clearances are as follows, in this order:

1. FFP/M/R:
  - a. Mission Environmental Officer or Regional Environmental Advisor (in non-presence countries)
  - b. FFP Officer
  - c. Director
2. FFP/W:
  - a. Agreement Officer's Representative
  - b. Regional Bureau Environmental Officer (optional)
  - c. Agreement Officer
  - d. Bureau Environmental Officer

### IV. Resources for the Preparation of Initial Environmental Examinations

While taking precedence, this guidance draws from existing documents which can be accessed on the [USAID Environmental Compliance: Impact Assessment](#) webpage.

For a short overview to the USAID Regulation 216 process for Title II awardees, applicants should refer to [A Field Guide to USAID Environmental Compliance Procedures \(2000\)](#). More details are found in the [USAID Environmental Procedures Training Manual AFR Edition](#),

(EPTM, 2002). A searchable database for the IEE is found on the Environmental Assessment Capacity Building Program (ENCAP) website supported by USAID's Africa Bureau. Recommended best management practices are found in *Environmental Guidelines for Small Scale Activities in Africa*, and *Environmental Guidelines for Development Activities in Latin America and the Caribbean* and *Environmental Guidelines for Small Scale Activities in Asia Near East*.

Technical sector-specific guidance can be found at the ENCAP website. Illustrative sector-specific guidelines include:

- **Water/Sanitation/Hygiene:** *Guidelines for the Development of Small Scale Rural Water Supply and Sanitation Projects in East Africa*. Warner.D, Abate.C., July 2005;
- **Roads:** *Low-Volume Roads Engineering: Best Management Practices Field Guide* (Keller and Sherar, 2003);
- **Fertilizer:** *Inorganic Fertilizer Use in Africa Environmental and Economic Dimensions*;
- **Pesticides:** *USAID/AFR Guidance: Preparing PERSUAPs for pesticide programs in Africa*;
- **Fuelwood:** *Cooking Options in Refugee Situations: A Handbook of Experiences in Energy Conservation and Alternative Fuels* (UNHCR 2002).

For rapid-onset emergencies, the *Guidelines for Rapid Environmental Impact Assessment in Disasters* and the *Sphere Humanitarian Charter and Minimum Standards in Disaster Response Handbook (2011)* are useful tools in minimizing impact of relief to public health and the natural resource base. In addition to these resources, Bureau and USAID/Mission environmental officers should be consulted for program-specific feedback.

## TITLE II Initial Environmental Examination Facesheet

**Title of Potential Development Food Assistance Program:**

**Potential Awardee:**

**Host Country/Region:**

*The following information references requests from the development food assistance program proposal is therefore anticipated.*

**Funding Begin:**

**Funding End:**

**LOA Amount: \$**

**Sub-Activity Amount: \$**

**Resource Levels**

**Food Aid Commodity:**

MT

**Monetization**

**Section 202(e) funds: \$**

**ITSH funds: \$**

**Request: \$**

**IEE Prepared by:**

(Name/Title)

**Date:**

**IEE Modification (Y/N):**

If “Yes,” Date of Original IEE:

**Environmental Action Recommended: (*Place X where applicable*)**

☐ **Request for Categorical Exclusion(s):** activities have no adverse effect (i.e., training, technical assistance; not to include any infrastructure rehabilitation.)

☐ **Negative Determination:** no significant adverse effects expected for activities which are well defined over life of the award.

☐ **without conditions** (no special mitigation measures needed)

☐ **with conditions** (mitigation measures specified)

☐ **Positive Determination:** potential for significant adverse effect of one or more activities. Appropriate environmental review needed/conducted.

☐ **Deferral:** elements not well defined; activities will not be implemented until modified IEE is accepted. Briefly describe here:

## 1. Environmental Media and/or Human Health Potentially Impacted

(Check all that apply):

- ☐ Air
- ☐ Water
- ☐ Land
- ☐ Biodiversity (specify) \_\_\_\_\_
- ☐ Human Health
- ☐ Social
- ☐ None

## 2. Summary of Findings:

Proposed activities to be implemented under the Title II program include:

- *applicants should enter their proposed activities here;*
- *etc.*
- *etc.*

The IEE: 1) classifies all activities under an award according to level of adverse impact to the environment (i.e., natural and physical environment and the relationship of people with that environment (National Environmental Policy Act section 1508.14)) and 2) develops mitigation measures to minimize or eliminate risk for activities having direct, indirect or cumulative impacts.

Applicants should briefly describe (in one or two paragraphs) the proposed activities for implementation and those proposed for deferment. Applicants should justify the reason for the recommended action(s) and cite appropriate sections of USAID Regulation 216 as needed. The *Summary* section of the IEE narrative, and/or the request for categorical exclusion should be reproduced here.



### 3. Food for Peace Approval of the Initial Environmental Examination

#### *A. Food for Peace Mission or Regional Office, as appropriate:*

\_\_\_\_\_  
Mission Environmental Officer or Regional Environmental Advisor (in non-presence countries)      Date:\_\_\_\_\_

\_\_\_\_\_  
Food for Peace Officer      Date:\_\_\_\_\_

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

#### *B. Food for Peace, Washington*

\_\_\_\_\_  
Agreement Officer's Representative      Date:\_\_\_\_\_

\_\_\_\_\_  
Regional Bureau Environmental Officer\*      Date:\_\_\_\_\_

\_\_\_\_\_  
Agreement Officer      Date:\_\_\_\_\_

#### *C. Concurrence*

\_\_\_\_\_  
**DCHA Bureau Environmental Officer**      **Date:\_\_\_\_\_**

☐ Accepted

☐ Unaccepted

*\* Clearance is suggested but not mandatory*

#### **4. Request for a Categorical Exclusion**

##### *A. Background and Activity Description:*

Applicants should provide more in-depth information than what was provided on the facesheet, especially if activities are relatively diverse, complex and likely to operate for several years. This will allow the environmental recommendation to be more self-explanatory and free-standing, especially for the DCHA/BEO's record keeping and tracking purposes.

##### *B. Justification for Categorical Exclusion Request:*

Refer to appropriate guidance from USAID Regulation 216, especially 22 C.F.R.216.2(c)

## **TITLE II Initial Environmental Examination**

### **Potential Food Aid Program Data**

**Potential Food Aid Program Name:** \_\_\_\_\_

**Potential Food Aid Program Category: (Development or Emergency Food Assistance Program)** \_\_\_\_\_

**Potential Awardee:** \_\_\_\_\_

**Potential Host Country:** \_\_\_\_\_

**Potential Food Aid Program Life of Award:** \_\_\_\_\_

Applicants may use this guidance as a template for the Initial Environmental Examination (IEE). When developing the IEE, applicants should refer to previously accepted IEEs from food aid programs implemented in Africa, available in the [IEE Archives](#) of the ENCAP website.

### **I. Background and Activity Description**

Describe why the activity is desired and appropriate and outline the key activities proposed for Title II funding. A current activity description should be provided and the purpose and scope of the IEE indicated (amendment, why needed, what it covers).

### **II. Host Country and Environmental Information**

This section is critical and should briefly assess the current physical environment that might be affected by the activity. Depending upon the activities proposed, this could include an examination of land use, geology, topography, soil, climate, groundwater resources, surface water resources, terrestrial communities, aquatic communities, environmentally sensitive areas (e.g., wetlands or protected species), agricultural cropping patterns and practices, infrastructure and transport services, air quality, demography (including population trends/projections), cultural resources, and the social and economic characteristics of the target communities.

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

1. Locations Affected: Identify the geographic area (e.g., three provinces of affected country) for food aid program implementation;
2. Host Country National Environmental Policies and Procedures

Indicate the status and applicability of host country, FFP/M/R and awardee policies, programs and procedures in addressing natural resources, the environment, food security, and other related issues.

### **III. Evaluation of Proposed Activity and/or Program Issues with Respect to Environmental Impact Potential**

This section of the IEE is intended to define all potential environmental impacts of the distinct activities whether they are considered direct, indirect and/or cumulative over the life of proposed food aid program, including design, operation and reasonable provisions for food aid program graduation and exit strategies. Be clear and concise in the organization of this section.

According to NEPA, direct effects or impacts, are caused by the action and occur at the same time and place. Indirect impacts are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect impacts may include growth-inducing impacts and other impacts related to induced changes in the pattern of land use, population density or growth rate and related effects on air and water and other natural systems, including ecosystems.

As a review, environmental impact is based upon both the 1) underlying or “baseline” condition of the surrounding environment (e.g., depth to water table, degree of slope and stability of soil) and 2) the nature of the activity itself (e.g., solid waste removal, road construction and/or rehabilitation). It is logical when developing an IEE to cluster the mitigation measures for those activities that are of a similar nature and have comparable underlying conditions (e.g., well rehabilitation in a periurban setting). It is also reasonable, however, that for those activities that are of similar nature (e.g., well rehabilitation), but operating under widely different underlying environmental conditions (e.g., periurban setting vs. upland plateau or coastal plain), that the environmental mitigation measures would not be entirely clustered. In this illustrative case, protection of the water source from automobile oil contamination would be more relevant in a periurban setting while salinization would be more so in a coastal plain. In contrast, there will be several mitigation measures for well rehabilitation that will be common across all wells (i.e., prevention of disease vector breeding sites and protection from human or animal waste contamination) and hence clustered in the IEE.

### **V. Recommended Mitigation Actions (Including Monitoring and Evaluation)**

#### **1. Recommended USAID Regulation 216 Determinations**

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

#### **2. Mitigation and Monitoring**

Recommend what is to be done to avoid, minimize, eliminate or compensate for environmental impacts. For activities where there are expected environmental consequences,

appropriate environmental monitoring and performance indicators should be incorporated in the activity's monitoring and evaluation plan.

Mitigation measures for direct, indirect and/or cumulative impacts of distinct activities must include the proposed food aid program design and operation phases as well as reasonable provisions for food aid program graduation and exit strategies. Should the Development Food Assistance Program proposal be accepted, it is expected that the exit strategy will adaptively be developed over the course of the food aid program as reported in the annual Environmental Status Report submission.

## **VI. Summary of Findings**

The applicant should summarize the proposed environmental determinations of the proposed food aid program.

## LIST OF ACRONYMS

BEO	Bureau Environmental Officer
C.F.R.	Code of Federal Regulations
DCHA	Democracy, Conflict, and Humanitarian Assistance
EA	Environmental Assessment
EDM	Environmental Documentation Manual
EMP	Environmental Management Plan
ENCAP	Environmental Capacity Building Program
EPTM	Environmental Procedures Training Manual
ESF	Environmental Screening Forms
FFP	Food for Peace
FFW	Food for Work
IEE	Initial Environmental Examination
LOA	Life of Award
PEA	Programmatic Environmental Assessment
PERSUAP	Pesticide Evaluation Report and Safe Use Action Plan
PREP	Pipeline and Resource Estimate Proposal
REA	Rapid Environmental Assessment
REO	Regional Environmental Officer
USAID	United States Agency for International Development