PROGRAMMATIC INITIAL ENVIRONMENTAL EXAMINATION FOR FOOD FOR PEACE INTERNATIONAL FOOD RELIEF PARTNERSHIP (IFRP)

PROGRAM/ACTIVITY DATA:

Title of Program: International Food Relief Partnership (IFRP): Transport, Delivery, and Distribution Applications, Office of Food for Peace (FFP), DCHA Bureau

Operating Unit Grant Number(s): Various, contact AOR **RFA** #: IFRP-2017-RFA-00001
AOR

Country/Region: Various, contact AOR **Implementing Partner:** Various, contact AOR

Funding Begin: FY 2017 **Funding End:** FY 2019

LOP Amount: Total: $1,500,000 Award Ceiling: $150,000 Award Floor: $0

IEE Drafted by: USAID FFP AOR, USAID Environment Staff **Date**: May 3, 2017

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 to ensure no adverse effect)

☐ **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 amended IEE is approved. Briefly describe here:

Recommended Climate Risk Rating: (Place X where applicable)

☒ **High Risk -** indicates climate change is likely or highly likely to materially impact achievement or sustainability of project or activity outcomes.

☒ **Moderate Risk -** indicates climate change may materially impact achievement or sustainability of project or activity outcomes.

☒ **Low Risk -** indicates climate change is unlikely to materially impact achievement or sustainability of project or activity outcomes.

SUMMARY OF FINDINGS

The purpose of this document is to assess the overall environmental risk of activities under the International Food Relief Partnership (IFRP) program and provide a) regulatory determinations of environmental impact and b) conditions for mitigation of those impact that qualify for a **Negative Determination,** per 22 CFR 216.3 (a)(2)(iii), **with conditions, as specified herein.**

The IFRP is a USAID program to support the transportation, delivery, and distribution of shelf-stable, prepackaged foods by U.S. non-profit and Public International Organizations. Grant awards under the IFRP program are subject to all applicable requirements of USAID, including 22 C.F.R. 216.

ENVIRONMENTAL THRESHOLD DETERMINATIONS:

The overall environmental determination for the IFRP is a **Negative Determination, with Conditions,** with classes of activities grouped into two different 22 CFR 216 determinations:

A **Categorical Exclusion** is recommended for the majority of activities implemented under the IFRP because no environmental impacts are expected as a result of their implementation and the programs meet the *criteria* of USAID Environmental Regulation 216 (22 CFR 216), subparagraph 2(c)(1) and the *classes of action* pursuant to 22 CFR216.2 (c)(2):

> (i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction, etc.);

A **Negative Determination with Conditions**, pursuant to 22 CFR216.3(a)(2)(iii), is recommended for activities implemented under the IFRP that have the potential for negative environmental impacts and require mitigation measures. These include the following activities:

All IFRP activities require the implementation of the following actions:

1. **Contract Language:** IFRP grantees, working with the FFP Agreement Officer Representative shall include required environmental compliance and reporting *language into each implementation instrument in accordance with activity impact and mitigation analysis in Sections 3 and 4 of this IEE*, and ensure appropriate resources (budget), qualified staff, etc.
2. **Oversight**: As required by ADS 204.5.4, the AOR, in consultation with IFRP implementing partners, Mission Environmental Officers (MEO), and the DCHA Bureau Environmental Officer (BEO), will *monitor and evaluate* whether environmental consequences unforeseen under activities covered by this P-IEE arise during implementation.
3. **Environmental Governance**: Implementation will in all cases adhere to applicable *partner country* environmental laws.
4. **Product Storage and Warehousing, Pesticide Use** is not addressed in this P-IEE given

that the Medium Quantity Lipid-based Nutrient Supplement, Harvest Lentil Pro, and Nutributter are in plastic or Mylar wrapping which are resistant to pests. Where the grantee may determine a need for pesticide use for product protection, **or informal/nonfunded use for gardening activities**, then the grantee should contact the USAID AOR and BEO immediately, as specialized analyses would need to be performed to ensure safer use. USAID will assist IFRP partners in complying with the USAID Pesticide Procedures as per 22 CFR 216.3 (b)(I).

5. **Climate Risk Screening:** The process of screening for and addressing climate risks for IFRP activities runs in parallel to the Environmental Threshold Decision process, which focuses explicitly on the environmental impact of a proposed action on the environment.[1] Just as the regulations regarding Agency Environmental Procedures (22 CFR 216) require consideration of environmental impacts risks and concrete measures to address them, Mandatory Reference resources for ADS Chapter 201 ("Climate Risk Management for USAID Project and Activities" and "Climate Change in USAID Strategies") require consideration of climate change risks to the project and specific measures to mitigate them.

Table 1. Environmental Impacts and Climate Risks to IFRP Activities

IFRP Activity	Potential Environmental Impact	Potential Climate Risk
Direct Distribution of Product	Solid Waste from Product Packaging	Access constraints due to water on roads from flooding or sea level rise
	Energy use in Cooking of Food Product	
Provision of Health Care Services	Medical Waste Disposal	Increased incidence as well as change in range of disease vectors (such as change in prevalence at higher altitudes than in past) due to heat and precipitation changes
Repair of Health and Feeding Centers	Hazardous Materials	Increased need for repair due to extreme storms. Changes in occupancy comfort due to increases in temp, humidity or rainfall.

[1] The regulation regarding Agency Environmental Procedures (22 CFR 216) explicitly frames the Threshold Decision and resulting actions based on the decision (i.e., whether an Environmental Assessment or Environmental Impact Statement is required) in the context of potential impact of an Agency action on the environment. For example, 22 CFR 216.1(c)(3) states that the Threshold Decision is "A formal Agency decision which determines, based on an Initial Environmental Examination, whether a proposed Agency action is a major action significantly affecting the environment", The Threshold Decision determines "whether an Environmental Assessment or an Environmental Impact Statement will be required" (22 CFR 216.1(c)(2)). Both the Environmental Assessment and the Environmental Impact Statement concern reasonably foreseeable impacts of a proposed Agency action on the environment. https://www.usaid.gov/our_work/environment/compliance/22cfr216

Household Vegetable Gardens	Soil Quality, Water Consumption, Pesticides	Decreased crop yield due to drought, flood, low soil quality, night time temperatures etc.
Storage of Commodity	Pesticides	Heat and humidity exposure damaging packaged commodity

CLIMATE RISK DETERMINATIONS:

The climate risks for this IFRP will be determined by location of implementation. Climate risks include sea level rise, drought, flood, extreme storms, etc. that might impact the efficacy of the proposed activity. Three different climate risk determinations can be reached: Low, Moderate, or High. Information on how to make these risk determinations can be accessed in ADS 201mal.

For each of the IFRP activities, possible climate risks have been identified. The IP should fill out the CRM table as part of their EMMP to account and plan for the climate risks that are determined to be moderate or high. If low risk is expected, a short explanation of why will suffice.

Table 2: Climate Risk Management Table

IFRP ACTIVITY: Tasks/ Defined or Illustrative Interventions	**Climate Risks** List key risks related to the defined/ illustrative interventions identified in the screening and additional assessment	**Risk Rating** Low/ Moderate / High	**How Risks are Addressed** Describe how risks have been addressed in activity design and/or additional steps that will be taken in implementation. If you chose to accept the risk, briefly explain why.	**Opportunities to Strengthen Climate Resilience** Describe any opportunities to achieve multiple development objectives by integrating climate resilience or mitigation measures

USAID APPROVAL OF ENVIRONMENTAL ACTION(S):

Clearance:

FFP Director/Agreement Officer (AO):_____by email_____Date: ____May 26, 2017___
Matt Nims

IFRP Agreement Officer's Representative (AOR): _____by email_____Date: __May 26, 2017
Ben Vogler

Concurrence:

DCHA Bureau Environmental Officer: _*Erika Clesceri*___ _____Date:_May 30, 2017
Erika J. Clesceri, Ph.D.

Approved: ☒

Disapproved: ☐

Cc: Regional Bureau Environmental Officers (BEOs) in IFRP Regions
(LAC: Diana Shannon; AFR: Brian Hirsch; E&E: Mark Kamiya; Asia: Will Gibson; ME: John Wilson)

PROGRAMMATIC INITIAL ENVIRONMENTAL EXAMINATION (P-IEE) FOR THE INTERNATIONAL FOOD RELIEF PARTNERSHIP (IFRP)

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1. Background and Project Description

The International Food Relief Partnership (IFRP) is a USAID program authorized by section 208(a)(2) of the Food for Peace Act, 7 U.S.C. § 1726b(a)(2) to support the production, stockpiling, transportation, delivery, and distribution of shelf-stable, prepackaged foods by U.S. non-profit and Public International Organizations. For FY 2017, three products are available for distribution: Medium Quantity Lipid-based Nutrient Supplement, Harvest Lentil Pro, and Nutributter. The products will be delivered to implementing partners in participating countries where they will be stockpiled and distributed to beneficiaries.

The goal of the IFRP is to enhance food security of vulnerable populations across the globe through distribution and feeding programs. Secondary activities focus on improved food production and management to better cope with food shortages. The Medium Quantity Lipid-based Nutrient Supplement, Harvest Lentil Pro, and Nutributter provisions will help to balance and supplement the diets of vulnerable populations in host countries, including those of children, nursing mothers, and the elderly. A number of feeding strategies will be covered under this P-IEE including 1) targeting of food distribution centers to sensitive populations; 2) upgrading feeding programs; 3) establishing regional distribution centers; 4) conducting nutritional training for beneficiaries; and 5) monitoring of health and education improvements in beneficiaries.

This umbrella Programmatic Initial Environmental Examination (P-IEE) pertains to all activities potentially carried out under IFRP awards. Potential environmental impacts as well as mitigation measures are described for proposed project activities. In the case that activities do not fall into the categories detailed in this P-IEE, the implementing partner will be responsible for additional clearances from the BEO.

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2. Country and Environmental Information

Activities under IFRP may take place in any of the USAID mission countries or in countries covered by USAID Regional missions. Environmental procedures are detailed in national policies.

Environmental information for each country and project location varies in physical and topographic conditions, climate, soils, and ecosystems. It is anticipated that IFRP projects will be carried out in multiple urban and rural ecosystems in areas that are beset by poverty. All proposed activities are expected to be small in scale and primarily involve the stockpiling and distribution of food products to beneficiaries as well as training beneficiaries on preparation of the products.

A set of useful reference materials for guidance concerning sustainable use of natural resources in IFRP countries are USAID's Biodiversity and Tropical Forestry Analyses, called 118/119 Analyses, for short. These 118/119 Analyses identify strategic national priorities and threats related to the conservation and sustainable use of tropical forests and biological diversity in an effort to inform sustainable design and implementation of USAID programming in a particular country. IFRP grantees are recommended to inquire with their local USAID Mission about any existing 118/119 Analyses and reference them as is appropriate for their planned activities. See one example of a 118/119 from Liberia at, http://www.usaidgems.org/Documents/FAA&Regs/FAA118119/Liberia2014.pdf.

The implementing partners will work in the context of all applicable country-specific and regional laws, regulations, treaties, and conventions. IFRP will coordinate closely with local governing bodies, to comply with all policies and regulations.

3. Evaluation of Environmental Impact

The activities under IFRP are generally limited to food distribution, nutritional training, and education of beneficiaries on food preparation. Most of these activities do not have any environmental impact and are included as **Categorical Exclusions**, as they entail technical assistance, information, education, communication, training, research, community mobilization, planning, management, and outreach activities.

Based upon review of the IFRP portfolio, a number of IFRP activities could potentially have an impact on the environment in the absence of appropriate environmental mitigation measures. In order to facilitate the analysis of potential environmental impacts the potential IFRP activities have been grouped into *three different activity types* based on their potential to cause environmental impacts. These same activity types will be utilized when determining climate risks. The IFRP activities are grouped into Types I-III in **Table 3** below:

Table 3. Summary Table of Potential Environmental Impacts of IFRP Activities

Illustrative IFRP Activity Types:	Potential Environmental Impacts
Type I Activities: Training in improved childcare and feeding practices, research into community incidence of malnutrition, etc.	None, other than solid waste from meeting
Type II Activity: Direct Distribution of Products	Solid Waste (i.e., trash, rubbish) produced from Nutributter and Medium Quantity Lipid-based Nutrient Supplement wrappers/sachets and Lentil Pro bags and serving containers (e.g. disposable plastic bowls, spoons); energy consumption (e.g. fuelwood) from cooking large amounts of food.
Type III Activities: Provision of Medical Supplies and Support; Small-scale Construction or Rehabilitation of Program Facilities; Household Gardening	Solid and hazardous medical waste generation, Soil erosion and siltation of surface waters, water contamination from run-off, Human health and ecological impacts from agro-chemical use, unsustainable sourcing of construction materials, use, or handling, of hazardous construction materials (e.g. asbestos insulation, shingles, lead paints, etc.)

EVALUATION OF ENVIRONMENTAL IMPACT (CONT.):

Type I Activities: Trainings in Improved Child Care and Feeding Practices (Figure 1)

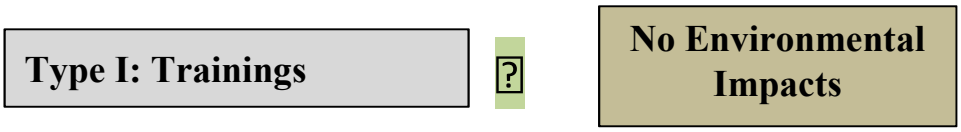

Figure 1. For all IFRP training, there are no impacts expected to result from IFRP training activities, except for those training activities that may lead to the generation of solid waste.

Please note, training is not exempt from CRM and should be listed in the CRM table as an activity type. The potential impacts of climate such as reduced attendance due to an adverse storm event should be considered and an appropriate rating should be given.

Type II Activity: Direct Distribution of Products, Impact includes Solid Waste and Energy for Cooking (Figure 2).

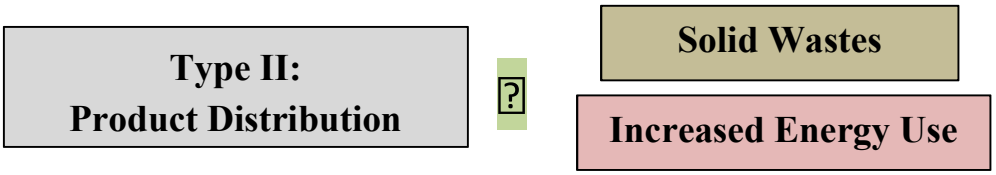

Figure 2. For IFRP product distribution, there are two potential environmental impacts.

1. **Solid Waste Generation as Direct Result of IFRP Product Distribution**
   Solid waste management is a particular concern for IFRP activities due to the need for disposal of the food products' packaging and wrappers/sachets. Simple calculations of these solid wastes potentially generated, indicate the need for IFRP programs to consider the best disposal options. For example, Nutributter products are associated with a large amount of solid waste from sachets/wrappers of individually wrapped Nutributter bars. A program distributing 100 Metric Tons (MTs) of Nutributter, will require disposal of

approximately 5,000,000 sachets, given each bar weighs 20g. (http://www.nutriset.fr/en/product-range/produit-par-produit/enov-nutributter.html) In the case of Breedlove, a program distributing 75 Metric Tons (MTs), 74,976 bags will require disposal, given fifty 20 grams servings are contained per bag(http://breedlove.org/index.php?option=com_content&view=article&id=62&Itemid=69). In addition, Breedlove web information suggests that Styrofoam bowls and plastics spoons are used when serving the lentil soup mix, creating a significant solid waste stream of non-biodegradable materials, in countries that have limited solid waste landfills, etc.

2. **Energy Use for Preparation of Product** will require energy for cooking and water for cleaning, washing, and boiling the food products. The energy consumption related to these activities and the source of the energy, such as fuelwood, may potentially damage the environment as well as be costly or infrequently available. Many cooking practices do not consider cooking time and the amount of energy input required to cook certain products. The IFRP is limited to Medium Quantity Lipid-based Nutrient Supplement, Harvest Lentil Pro and Nutributter products; however, beneficiaries may also be encouraged to add their own ingredients into recipes to supplement their diet. Harm to the environment could result by providing recipes and suggestions for supplemental foods that are unavailable or require high amounts of energy to prepare and cook.

3. **Distribution of Food Products and Feeding Equipment** may have an impact on the environment; however as the energy use impacts from cooking the food are already considered, the additional energy use impacts of transport are not expected to require additional mitigation.

4. **Product Storage and Warehousing, Pesticide Use** is not addressed in this P-IEE given that the Medium Quantity Lipid-based Nutrient Supplement, Harvest Lentil Pro and Nutributter are in plastic or Mylar wrapping which are resistant to pests. Where the grantee may determine a need for pesticide use for product protection, then the grantee should contact the USAID AOR and BEO immediately, as specialized analyses would need to be performed to ensure safer use. USAID will assist IFRP partners in complying with the USAID Pesticide Procedures as per 22 CFR 216.3 (b)(I). Additionally, if beneficiaries are using pesticides or fertilizers in their gardening practices**, regardless of whether it is funded by USAID,** the BEO must be notified.

5. **Impact of climate change** on food distribution and storage: Climate impacts may change the potential intensity of storm events, threatening stored commodities due to flooding or compromise storage facilities. Commodity storage may also alter the conditions not only from the threat of bulk water but can also make changes in humidity that may lead to earlier spoilage of commodities. Flooding and severe storm events may threaten the ability to distribute food commodities in a timely manner.

Type III Activities: Other Activities (A, B, C)

A. Provision of Health Care Services

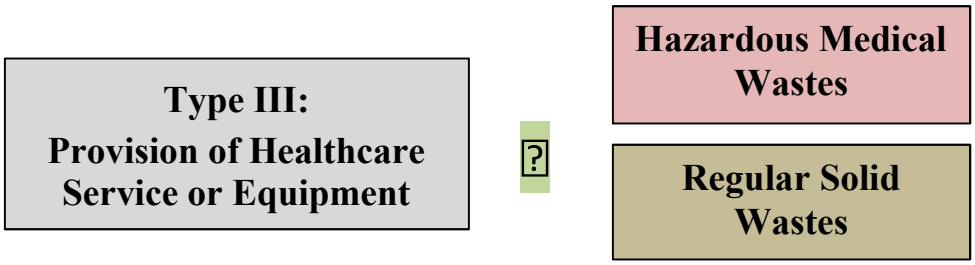

Figure 3. For other activities related to IFRP product distribution, such as medical and health care, there are two potential environmental impacts.

1. **Expected impacts from provision of healthcare services,** such as vaccinations or blood iron level sampling in support of activities to treat and reduce incidences of malnutrition, can be expected to produce potentially hazardous medical wastes in the form of sharps and used blood slides and sampling equipment as well as non-hazardous general medical wastes (plastic packaging materials, consumables, etc.).

   Healthcare Wastes. As review, these wastes generally fall into one of three categories: 1) **General healthcare waste**, similar or identical to domestic waste, including materials such as packaging or unwanted paper. This waste is generally harmless and needs no special handling; 75–90% of waste generated by healthcare facilities falls into this category; 2) **Hazardous healthcare wastes** including infectious waste (except sharps and waste from patients with highly infectious diseases), small quantities of chemicals and pharmaceuticals, and non-recyclable pressurized containers and 3) **Highly hazardous healthcare wastes** including sharps, highly infectious non-sharp waste, stools from cholera patients, and bodily fluids of patients with highly infectious diseases. (Source WHO (1999). Safe Management of Wastes from Health-Care Activities/ edited by A. Pruss, e. Giroult, P. Rushbrook., Geneva, World Health Organization - *Chapter 9: Application of Treatment and Disposal Methods to Health Care Waste Categories*[2].

   Improper waste management activities can result in:

   Increase disease transmission or otherwise threaten public health. Rotting organic materials pose great public health risks such as serving as breeding grounds for disease vectors. Sharps from vaccination activities or blood iron level sampling are considered hazardous medical wastes and require safe handling, sorting, proper treatment and disposal protocols to avoid health risks to health clinic patients, staff

[2] http://www.who.int/water_sanitation_health/medicalwaste/wastemanag/en/http://www.who.int/water_sanitation_health/medicalwaste/wastemanag/en/

and nearby residents.

Impact of climate change on health commodity supply and storage: Climate impacts may change the potential intensity of storm events, threatening stored health care commodities due to flooding or compromise storage facilities. Flooding and severe storm events may threaten the ability to distribute food commodities in a timely manner.

B. Small-scale Construction Activities

1. Potential impacts from small-scale construction activities:

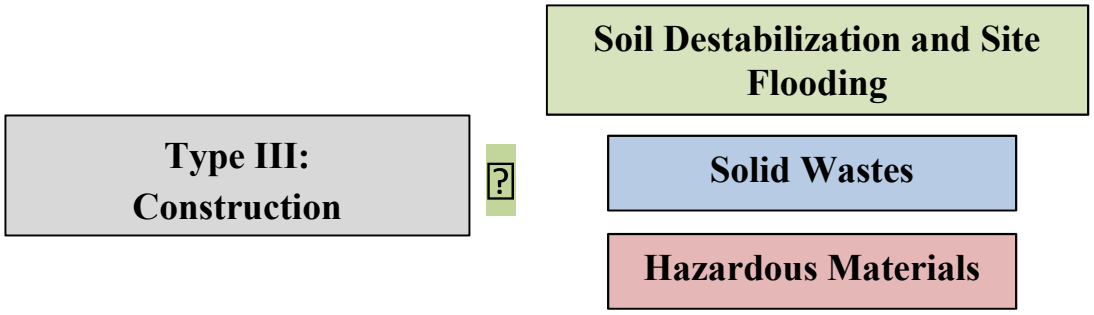

Figure 4. For other activities related to IFRP product distribution, such as small-scale construction, there are three potential environmental impacts.

EVALUATION OF ENVIRONMENTAL IMPACT (CONT.):

The rehabilitation and repair of buildings and facilities *(i.e. hospitals schools, clinics, centers and library)* may cause adverse environmental impacts without the proper mitigation. An example of such an impact is the exposure of facility workers and, nearby residents, to hazardous construction materials (asbestos, lead paint, etc.) as result of construction activities to replace a roof. Additional potential environmental impacts from IFRP small-scale construction activities are summarized below:

Summary of Potential Impacts:

a. Demolition or upgrading of older clinics may involve contact with hazardous construction materials (such as asbestos-treated materials in old roofing/insulation);

b. Construction site soil destabilization, erosion and flooding without proper site preparation and design;

c. Construction designs simply replicating local community designs, in absence of engineering standards, may not be appropriate;

d. Solid /hazardous wastes generated from construction process or increased as result of the construction process or procurement of equipment.

Climate risks and climate change impacts such as changes in the frequency or severity of extreme rainfall events and flooding, as well as increasing maximum temperatures can affect the longevity of planned small-scale construction, building repair, and rehabilitation activities over the medium and long term. In coastal locations, the possibility of rising sea levels and higher/increased storm surges can threaten repaired buildings. Changing rainfall patterns and increases in rainfall intensity can also affect the likelihood and location of landslides and erosion. Additionally, the short-term implementation of such activities (i.e., actual construction) can be threatened by the impacts noted above as well as increased frequency of heat waves, wildfires, and dust storms.

There is an additional layer of consideration with respect to climate risks for construction siting decisions. Changing climate conditions and resulting sea level rise can significantly affect the suitability of certain potential sites for new construction. For example, some geographic locations may face much greater risk of impacts from storm surges and flooding, as well as associated landslides and erosion. For further details on considering climate risks for small-scale construction, see the USAID Climate Risk Screening and Management Tool: Annex on Infrastructure, Construction, and Energy as well as the USAID technical report on Addressing Climate Change Impacts on Infrastructure.

All construction projects *should be given a climate rating of* ***high risk****. If projects or activities are undertaking a construction project of sufficient scope to require an engineer of record then the project of record should be responsible for completing the climate risk screening.*

C. Home Vegetable Gardening and Demonstration Plot Activities

1. Potential Impacts from Household Vegetable and Demonstration Gardens

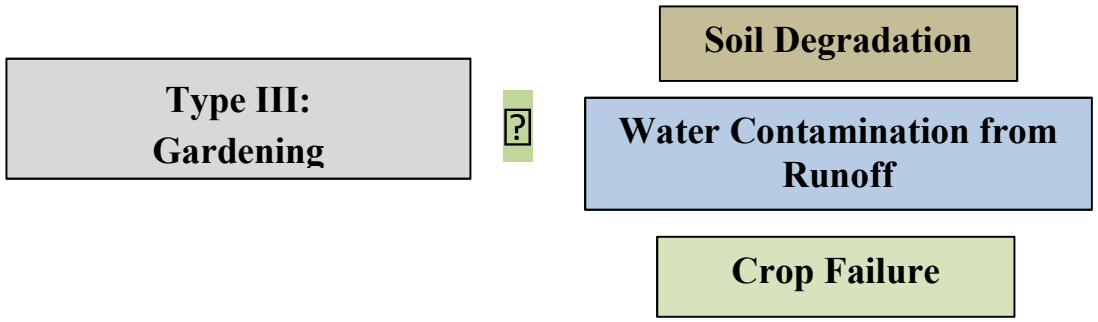

Figure 5. For other activities related to IFRP product distribution, such as school gardening, there are three potential environmental impacts.

Demonstration and household vegetable gardens may be used to illustrate agricultural methods for growing vegetables to supplement the Harvest Lentil Pro product. These gardens will provide a hands-on learning experience for beneficiaries. Gardens, while providing important supplemental nutrients and calories, have the potential to cause environmental impacts.

Summary of Potential Impacts of Demonstration Gardening and the potential for climatic impacts on these Activities include:

a. Soil erosion and contamination from runoff: Improper soil tilling techniques or irrigation can lead to increased erosion and loss of soil fertility. Pesticide and fertilizer use also have the potential to cause environmental harm. Pesticides and chemical fertilizers are not covered under this P-IEE. Bureau Environmental Officer (BEO) must approve all proposed pesticides prior to their use by IFRP grantees and beneficiaries, **regardless of funding source**.

b. Water availability: The availability of sufficient water to support production of home garden crops must be verified. Household gardening may upset existing water use sharing and lead to shortages and potential conflicts.

c. Improper crop selection, invasive species: Selection of crops not adapted to local conditions may lead to crop failure or encourage otherwise unnecessary increases in water and agro-chemical use. Invasive species may, inadvertently be introduced.

Climate related considerations:

Crops and gardens can face significant risks from climate-related extreme events (e.g., floods, storms, droughts, and heat waves). In addition, since many plants are sensitive to temperature conditions, they may be affected by increasing average, maximum and/or minimum temperatures. Maze is an example of a crop that is near its thermal limit in many Sub-Saharan African countries, and may be exceeded in coming years.
Climate change impacts can affect overall water supply and demand as well as irrigation requirements. For example, water supplies may be reduced due to decreased rainfall, increased groundwater extraction due to changing rainfall patterns, or changing streamflow patterns due to decreased snowpack or increased glacial melt arising from higher temperatures. The demand burden on water systems may increase due to shifting availability of water sources (e.g., reduced availability of rainwater may result in increased reliance on groundwater). Sea level rise in coastal areas can directly affect crops through increased storm surge intensity. Finally, rising sea levels, increased drought incidence, and changing water demands can contribute to increased risk of saltwater intrusion for both groundwater and surface water sources along the coasts. See USAID Climate Risk Screening and Management Tool: Annex on Agriculture for

additional details on considering climate risks for agriculture.

4. Recommended Determinations and Mitigation Actions

A. Recommended Determinations

The IFRP is primarily a packaged food product distribution and feeding program for vulnerable groups with the majority of activities having a limited impact on the environment. The **Type 1 IFRP Activities**, as described in the section above are eligible for **Categorical Exclusion** including:

> (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.);

Green Procurement Policy Advisement: Although such training activities mentioned above are excluded under the environmental compliance procedures, these activities do have the potential to generate solid wastes. Solid waste management is a critical issue for many of the countries where USAID holds meetings, conferences, and trainings. Many of these centers have sub-standard solid waste management systems which have a serious negative impact on both public health and economic development. For meetings, the implementing partner will consider green procurement concepts to eliminate, reduce, or recycle waste as summarized in the "Green Office Management" checklist, in **Attachment 1** of this IEE.

A **Negative Determination with Conditions**, pursuant to 22 CFR216.3(a)(2)(iii), is recommended for all **Type II and III Activities**, implemented under the IFRP, that have the potential for negative impact on the environment, as summarized in **Table 4**.

Table 4. Summary Table of Environmental Determinations by IFRP Activity Type:

ENVIRONMENTAL IMPACT DETERMINATION	ILLUSTRATIVE IFRP ACTIVITY TYPES:
Categorical Exclusion (not expected to have any environmental impact)	**Type I Activities**: Training in improved childcare and feeding practices, research into community incidence of malnutrition, community mobilizations and awareness outreach activities.
Negative Determination with Conditions (anticipated to have no impact provided that certain best-practice environmental safeguards and design considerations are in place)	**Type II Activity:** Direct distribution of large amounts of packaged food products
	Type III Activities: Provision of medical services or equipment, training in household gardening, small-scale construction for repair of health clinic or program facilities.

Table 5. Climate Risk Ratings by IFRP Activity Type:

CLIMATE RISK RATING (TO BE DETERMINED BY IPS FOR EACH PROJECT/REGION)	ILLUSTRATIVE IFRP ACTIVITY TYPES:
Low, Moderate, or High (unlikely, moderately likely, or highly likely to materially impact achievement or sustainability of project or activity outcomes.)	**Type I Activities**: Training in improved childcare and feeding practices, research into community incidence of malnutrition, community mobilizations and awareness outreach activities.
Low, Moderate, or High (unlikely, moderately likely, or highly likely to materially impact achievement or sustainability of project or activity outcomes.)	**Type II Activity:** Storage and direct distribution of large amounts of packaged food products
Low, Moderate, or High (unlikely, moderately likely, or highly likely to materially impact achievement or sustainability of project or activity outcomes.)	**Type III Activities:** Provision of medical services or equipment, training in household gardening, small-scale construction for repair of health clinic or program facilities.

B. Recommended Mitigations

Type I Activities: No Environmental Impact

Type II Activities: Impact Mitigation Measures for Direct Distribution of Food Products

1. Recommended Mitigations for Solid Waste Generation from Distribution of Food Products

Given that municipal and rural communities solid waste management systems in the IFRP countries of implementation are often ineffective to non-existent IFRP awardees must devise effective strategies for the disposal of wastes generated during food distributions. Some illustrative mitigation measures relevant to IFRP waste management are outline below:

a. **Waste minimization-** through elimination, recovery, reuse, recycling, or remanufacturing, of product packaging such as product shipping boxes and Breedlove bags.
b. **Waste reduction and disposal-** IFRP should prioritize re-usable material and food containers over non-reusable food containers and utensils. For non-reusable wastes, such as product wrappers or sachets, implementing partners should seek ways to confine and condense these wastes in order to minimize the space required for their final disposal. For example, implementing partners could promote the use of soft-sided reusable bags or cardboard boxes to contain and reduce storage space requirements of waste wrappers.
c. **Final disposal via burning or land burial-** non-biodegradable plastic wastes can be burned for final disposal. Also these wastes can be buried at designated landfills or waste dumps. All polyvinyl chloride (PVC) plastics should be buried, **not** burned.
d. **Discourage uncontrolled or illegal dumping**- instead promote disposal of wastes in government established sanitary landfills or dumps.

All IFRP waste management strategies should make use of the principles of integrated waste management embodied in the USAID Environmental Guidance for Small Scale Activities in Africa (EGSSAA), Chapter 15: Solid Waste Generation, Handling, Treatment, and Disposal (http://www.encapafrica.org/EGSSAA/solidwaste.pdf).

2. Recommended Mitigations for Energy Use Associated with the Preparation of Food Products

Energy use associated with preparing and cooking food products is expected to be high. By minimizing energy used to prepare food products the overall costs and impacts of the project are reduced. Trainings in food product recipes and use of supplemental ingredients that require less cooking time will save beneficiaries fuel energy. The recipes and training programs should include instructions on proportions so food can be cooked quickly or consumed immediately without re-cooking. Training programs on cooking practices and recipes, can also promote important behavioral change that result in reductions in energy use by target households.

Type III Activities: Impact Mitigation Measures for Provision of Medical Services, Home Vegetable Gardens and Small Scale Construction Activities

A. Step by Step Compliance Process for Type III Activities

All Type III activities require the implementation of the following mitigating actions to reduce potential impacts:

As described in the IFRP RFA Section V, grantees must notify USAID in advance of complementary activities that may negatively impact or harm environment, per USAID environmental compliance procedures (22 CFR 216).

Such IFRP Types III Activities may include: small-scale construction, vaccination campaigns that can be expected to generate medical waste.

- **Step 1**: Alert the AOR that the program would like to conduct activities outside of the scope of the direct distribution of product.
- **Step 2**: Describe only those activities that have the potential for environmental impact, (please refer to illustrative list of common IFRP Type III Activities, in Table above).
- **Step 3:** Propose mitigation measure to reduce the environmental impact within the context of the local community.

B. Recommended Mitigations for Provision of Healthcare Services that Generate Hazardous Medical Wastes (i.e. sharps, used blood sampling equipment, etc.)

It is understood that health care centers in USAID IFRP supported countries often have insufficient capacity to handle, treat and dispose of medical waste. This lack of capacity can be particularly severe in rural health care clinics. However, considerations for promoting and ensuring safe handling, treatment and disposal of medical wastes are important environmental management actions for any IFRP project activities that will provide healthcare services likely to generate medical wastes (such as vaccinations activities, and blood iron level sampling). This three-step approach provides a useful framework for planning to ensure sound medical waste management at health clinics supported by IFRP projects: 1. waste minimization via proper handling and sorting; 2. Centralized and isolated storage and; 3. Final treatment and disposal via burial or incineration,

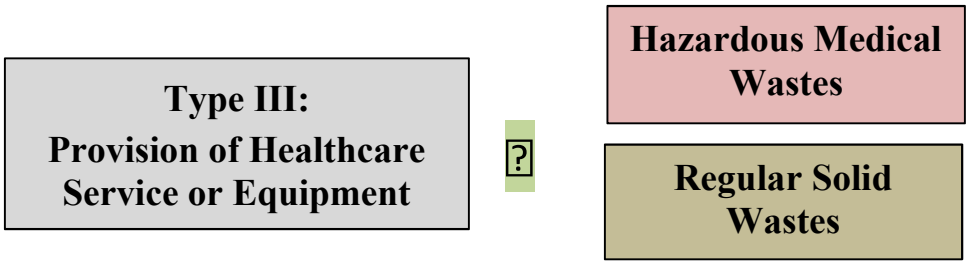

Figure 6. For other activities related to IFRP product distribution, such as medical and health care, there are two potential environmental impacts.

As a review, the available waste treatment options for health care waste treatment may be classified into four processes: 1) thermal, including incineration; 2) chemical, using disinfectants; 3) irradiative, using ionizing radiation; and 4) biological, using enzymes. The determination of the most cost effective treatment option will be dependent both on the type of medical waste and the health post capacity[3]. For used sharps in particular, such a waste that can be generated in large quantities during sporadic government or donor vaccination campaigns, many remote health posts lack sound disposal practices.

1. **Disposal of medical wastes via incineration:** USAID recognizes and supports the sound use of medical waste incinerators however it is important to emphasize that hazardous medical waste management requires strong technical oversight to ensure safe and effective treatment. Large volumes of medical waste are very difficult to treat properly via incineration even in the best of situations. These challenges and potential risks to human health and the environment are often compounded by challenges for on-site incineration such as a lack of maintenance for aging infrastructure.
2. **Alternative disposal techniques** for disposal of hazardous medical wastes such as

[3] "Assessment of Small-Scale Incinerators for Health Care Waste." WHO, 2004. http://www.who.int/immunization_safety/publications/waste_management/en/assessment_SSIs.pdf

sharps, blood slides, etc. may also be promoted given lack of access to infrastructure or capacity to treat wastes safely via incineration.

According to a 2004 WHO Assessment of Small-Scale Incinerators in Africa and India, in many remote areas open pit burning is still widely practiced for health care waste -including sharps. This treatment practice is objectionable due to emissions but also from incomplete disinfection and improper destruction of the sharps as result of the treatment process[1]. Incinerator use is an improvement to open pit burning, but in remote health posts is still fraught with difficulty. A Global Environmental Facility (GEF)[4] report notes risks stemming from poor operation and maintenance of small-scale, non-industrial waste incineration in Africa. Many designs for low-cost small-scale incinerators promise effective sterilization of health care waste, and these units have been constructed in a variety of settings. However, several studies using rapid assessment techniques indicate a variety of problems with De Montfort type incinerators including operator training, management and supervisor support, operation and maintenance, and siting[2].

As an alternative to incineration, IFRP projects may, in accordance with the USAID Environmental Guidelines for Small Scale Activities, consider the feasibility of disinfecting sharps via autoclaving, encapsulating them in a puncture proof box and then bury or transport them to a centralized disposal site. Appropriate low cost treatment options for sharps and other infectious wastes have focused largely on burial, encapsulation and autoclaving (sterilization by steam and pressure). Shredding of waste and landfill disposal is required following autoclaving. Burial pit and site must be adequately selected for goal of excluding possibility of people and animals coming into contact with hazardous or infectious wastes (this must include consideration of drinking water contamination risks). Indeed, in developed countries, many hospitals and other generators have moved away from incineration to autoclaving, responding to increasingly stringent emission controls, cost arguments, and public acceptance[2].

C. Recommended Impact Mitigation Measures for Household and Demonstration Vegetable Gardening Activities

Implementing partners will consider environmental issues (e.g., invasive species, soil degradation, water quality and availability, etc.) associated with the planting of demonstration gardens. Demonstration gardens not only have the potential to impact the environment, but importantly, sound environmental practices at locations where beneficiaries are being trained has incalculable value for teaching and reinforcing sound environmental practices.

Degradation of soil components includes both soil erosion and loss of soil fertility. Soil fertility is dependent on three major nutrients (nitrogen, phosphorous and potassium), various trace elements, and organic matter content. Repeated seasons of intensive cultivation should be balanced with sufficient fallow, or incorporation of additional organic materials or cover cropping

[4] "Need Assessment for Hospitals in Africa Countries In Relation to Infectious Wastes Treatment." UNDP Global Environmental Facility (GEF). May 2009. http://gefmedwaste.org/downloads/Report:%20Needs%20Assessment%20for%20Hospitals%20in%20African%20Countries%20in%20Relation%20to%20Infectious%20Waste%20Treatment.pdf

to replenish essential nutrients. Soil fertility and water absorption capacity are both greatly improved when soils contain sufficient organic content. In hillside plots, contour planting, soil stabilization structures and low till field preparation practices can also help reduce erosion. Channeling excess water runoff into soak pits located around garden also reduces risk of silt build-up in natural drainage ways and nearby surface waters, while also conserving water and helping groundwater recharge. Any pesticides and/or fertilizers promoted or used in demonstration vegetable gardening activities, **regardless of funding source or direct support of the implementing partner**, should be reported to the BEO.

In addition to natural resource concerns, vegetables for the gardens should be carefully selected. All vegetable varieties should be well adapted to the local growing regions and seed should be certified to reduce the risk of low seed germination rates or inadvertent introduction of invasive. Vegetables with short cooking times or that can be cooked directly with the Harvest Lentil Pro base will require less energy for preparation.

The Environmental Guidelines for Small-Scale Activities in Africa can provide additional tools for reducing soil erosion, preventing the loss of soil fertility, and reducing water consumption. Additional guidance on low input gardening and soil and water resource protection can be found at obtained from the John Snow International: Growing Positively Low Input Gardening http://www.jsieurope.org/docs/growing_positively_book.pdf.

D. Recommended Impact Mitigation Measures for Small-Scale Construction, Repair or Rehabilitation (such as health facility roof replacement, retrofits and upgrades).

Most IFRP small-scale construction projects will likely focus on facility rehabilitation and repair. Mitigation measures are required in the form of **planning and design mitigations** that help avoid or reduce the severity of impacts resulting from the construction activities.

Construction designs should anticipate potential impacts from the project and propose mitigation measures in accordance with the USAID Environmental Guidelines for Small Scale Activities Chapter 3: Small-scale Construction (http://www.encapafrica.org/EGSSAA/construction.pdf)
An illustrative set of such mitigation measures are included below:

1. **Construction planning and design mitigations**
    a) **Design considerations appropriate for local climate conditions:** such as use of hurricane straps on roofing, re-enforced walls and load bearing structures in earthquake prone areas, proper drainage ways for flood and rain season, appropriate ventilation and air flow for hot climates.
    b) **Plan for sound waste disposal:** including provisions for sound disposal of all wastes generated during construction in a government approved landfill. Disposal on-site via burial in an area designated for waste disposal is also an alternative disposal option.
        i. On-site sorting of construction wastes based on type of waste (organics/bio-degradable wastes, general non-biodegradable solid wastes, recyclable/reusable (metals, concrete, timber) and hazardous wastes etc.) can facilitate storage, transport and final disposal or re-use.

c) **Selection of non-hazardous construction materials whenever possible:** By avoiding the use of hazardous construction materials potential human health and environmental risks are minimized during handling, transport, storage, use and eventual disposal of these materials.
d) **Promote sustainable sourcing of local materials**- all local material sourcing activities must avoid sourcing materials from sensitive or protected ecosystems (i.e. forests, river banks and beds, wetlands and hillsides)
e) **Adherence to host-country construction codes and relevant laws:** The project must identify and comply with applicable host nation laws, and local ordinances.
f) **Soil stability and drainage measures:** During construction site preparation (land leveling, backfilling, drainage work, demolition, etc.) resulting soil destabilization and water diversion impacts require mitigations (such as the use of hay bales, planting of vegetation, drainage system installation, etc.) to minimize erosion and control water run-off.

C. Mitigation Measures Common to All IFRP Projects

All IFRP activities, regardless of their type, require use of the mitigation actions:

1. **Contract Language:** IFRP grantees, working with the FFP Agreement Officer Representative shall include required environmental compliance and reporting language into each implementation instrument in accordance with activity impact and mitigation analysis in Sections 3 and 4 of this IEE, and ensure appropriate resources (budget), qualified staff, etc.

2. **Oversight:** As required by ADS 204.5.4, the AOR, in consultation with IFRP implementing partners, Mission Environmental Officers (MEO), and the DCHA Bureau Environmental Officer (BEO), will monitor and evaluate whether environmental consequences unforeseen under activities covered by this P-IEE arise during implementation.

3. **Environmental Governance**: Implementation will in all cases adhere to applicable host country environmental laws.

4. **Product Storage and Warehousing, Pesticide Use** is not addressed in this P-IEE given that the Medium Quantity Lipid-based Nutrient Supplement, Harvest Lentil Pro, and Nutributter are in plastic or Mylar wrapping which are resistant to pests. Where the grantee may determine a need for pesticide use for product protection, or informal/nonfunded use for gardening activities, then the grantee should contact the USAID AOR and BEO immediately, as specialized analyses would need to be performed to ensure safer use. USAID will assist IFRP partners in complying with USAID Pesticide Procedures as per 22 CFR 216.3 (b)(I).

5. **Climate Risk Screening**
   The process of screening for and addressing climate risks for IFRP activities runs in parallel to the Environmental Threshold Decision process, which focuses explicitly on the environmental impact of a proposed action on the environment.[5] Just as the regulations regarding Agency Environmental Procedures (22 CFR 216) require consideration of environmental impacts risks and concrete measures to address them, Mandatory Reference resources for ADS Chapter 201 ("Climate Risk Management for USAID Project and Activities" and "Climate Change in USAID Strategies") require consideration of climate

[5] The regulation regarding Agency Environmental Procedures (22 CFR 216) explicitly frames the Threshold Decision and resulting actions based on the decision (i.e., whether an Environmental Assessment or Environmental Impact Statement is required) in the context of potential impact of an Agency action on the environment. For example, 22 CFR 216.1(c)(3) states that the Threshold Decision is "A formal Agency decision which determines, based on an Initial Environmental Examination, whether a proposed Agency action is a major action significantly affecting the environment", The Threshold Decision determines "whether an Environmental Assessment or an Environmental Impact Statement will be required" (22 CFR 216.1(c)(2)). Both the Environmental Assessment and the Environmental Impact Statement concern reasonably foreseeable impacts of a proposed Agency action on the environment. https://www.usaid.gov/our_work/environment/compliance/22cfr216

change risks to the project and specific measures to mitigate them.

As outlined in ADS 201 and associated Mandatory Reference resources, each IFRP project activity must be screened for climate risks and assigned a rating of Low, Moderate, or High. The implementing partner (IP) is responsible for conducting the climate risk screening process and documenting the results in this IEE. Below are the risk rating definitions and an illustrative example of each.

- Low climate risk – indicates climate change is unlikely to materially impact achievement or sustainability of project or activity outcomes. An example of a low climate risk is the potential consequence of higher temperatures on a governance initiative focused on anti-corruption reform.
- Moderate climate risk – indicates climate change may materially impact achievement or sustainability of project or activity outcomes. An example of a moderate climate risk is the potential consequence of increasing sea surface temperature, causing coral reef bleaching and subsequent reduction in wild fish populations, on a coastal fisheries management and food security program.
- High climate risk – indicates climate change is likely or highly likely to materially impact achievement or sustainability of project or activity outcomes. An example of a high climate risk is the potential consequence of sea level rise to a coastal transportation plan.[6]

The Mandatory Reference for ADS 201 provides a template for creating a Climate Risk Management Summary Table (CRM Table) and accompanying narrative. An example CRM Table is shown in Table 6 below. The narrative should describe how climate risks were identified and assessed, including critical resources used. The CRM Table and narrative are required for each IFRP project.

For each IFRP activity that is screened, all relevant climate risks should be identified and noted in the CRM Table. The likelihood of each climate risk to materially impact the project activity (in consideration of the climate stressor's severity and the ability to adapt to possible impacts) will determine the risk rating. ***If a climate risk is rated as Low, then only the descriptions of the activity, climate risk, and climate risk rating are necessary to include in the CRM Table (columns 1-3)***. For each climate risk that is rated as Moderate or High, the IP should also describe how the risks will be addressed at the Project/Activity Type level, any further analysis and/or actions necessary to address the climate risk at the activity level, as well as the opportunities to strengthen climate resilience.

[6] The Climate Risk Management Summary Table and the climate change risk rating descriptions were taken directly from the Climate Risk Management for USAID Project and Activities: Mandatory Reference for ADS Chapter 201. https://www.usaid.gov/sites/default/files/documents/1868/201mal.pdf

Table 6: Climate Risk Management Table

IFRP ACTIVITY: Tasks/ Defined or Illustrative Interventions	**Climate Risks** List key risks related to the defined/ illustrative interventions identified in the screening and additional assessment	**Risk Rating** Low/ Moderate / High	**How Risks are Addressed** Describe how risks have been addressed in activity design and/or additional steps that will be taken in implementation. If you chose to accept the risk, briefly explain why.	**Opportunities to Strengthen Climate Resilience** Describe any opportunities to achieve multiple development objectives by integrating climate resilience or mitigation measures

The following resources may be useful in screening for climate risks and completing the CRM Table.

- Specific USAID guidance on performing the risk screening process and completing the Climate Risk Management Summary Table, including annexes with additional information for various sectors and populations: https://www.climatelinks.org/resources/climate-risk-screening-management-tool
- Information about country-specific climate stressors and vulnerabilities can be found at the USAID Climate Links website: https://www.climatelinks.org/resources
- Sector-specific guidelines for including climate risks into project design and implementation can be found in the USAID/GEMS Sector Environmental Guidelines: http://www.usaidgems.org/sectorguidelines.htm

Local knowledge and expertise should also inform the screening, when available and appropriate. The DCHA Climate Integration Lead can also be consulted to provide additional resources, if needed.

All Activities must undergo climate risk screening, and the screening steps indicated above must be followed for each IFRP activity (including development of both the CRM Table and narrative). While not all activities will have a moderate or high climate risk, the specific nature of the activity and the climate conditions for the specific implementation location may significantly affect the climate risk.

In cases where a CDCS strategy-level climate risk screening has been conducted in a country in which IFRP will be implementing programming, and to the extent that it relates to IFRP programming, the IFRP project should incorporate the screening findings

into their approach.

If the CDCS strategy-level screening can be applied directly to an activity, and the activity has been assessed as Low risk at that strategy-level, then the IFRP project should include a note regarding the strategy-level screening determination in the CRM Table Risk Rating column. It is not necessary to further assess risk at the project or activity level. However, if the strategy-level screening as applied to an activity has resulted in a determination of Moderate or High risk, then the IFRP project must assess the climate risk level for that activity.

ATTACHMENT 1: GREEN OFFICE MANAGEMENT CHECKLIST:

(Applicable to IFRP Implementing Partner and Healthcare Facilities)

In this checklist, environmentally aware meetings and events are those planned in such a way as to eliminate, reduce, or recycle waste. While focusing on municipal solid waste, this checklist also touches on other environmental concerns. It is intended to heighten the environmental consciousness of event planners and demonstrate the advantages of conducting environmentally aware events.

Consider the following as you select your environmental priorities:

Preventing and Reducing Waste

- ☐ Focus on reducing waste, given limited in-country recycling facilities
- ☐ Use double-sided printing, recycled content -where available- for promotional materials and handouts.
- ☐ Avoid mass distribution of handouts. Allow attendees to request copies or provide digital copies via CD, thumb drive, or website.
- ☐ Provide reusable name badges.
- ☐ Purchase large volume plastic bottles of water to dispense into glasses at each table, instead of individual sized plastic bottles
- ☐ Other actions: _____

Recycling and Managing Waste

- ☐ Where facilities exist, collect paper and recyclable beverage containers in meeting areas.
- ☐ Collect cardboard and paper in exhibit areas.
- ☐ Collect cardboard, beverage containers, steel cans, and plastics in food vending areas.
- ☐ Separate out organic waste for composting, Provide composting guidelines for conference venues
- ☐ If reusable containers are not used, encourage use of recyclable beverage containers.
- ☐ Other actions: _____

Conserving Energy and Reducing Traffic

- ☐ Seek naturally lighted meeting and exhibit spaces.
- ☐ Provide shuttle service from hotels to the event site.
- ☐ Choose meeting sites that have on-site housing
- ☐ Other actions: _____

Contracting Food Service and Lodging

- ☐ Plan food service needs carefully to avoid unnecessary waste.
- ☐ Consider use of durable food service items instead of disposables.
- ☐ Donate excess food to charitable organizations, including planning ahead via SOW/contract with the conference venue to ensure this happens.
- ☐ Work with non-replacement of linens, soaps, etc.

- ☐ Other actions: _____

Buying Environmentally Aware Products

- ☐ Use recycled paper for promotional materials and handouts, where available.
- ☐ Consider selling or providing refillable containers for beverages.
- ☐ Provide reusable containers for handouts or samples (pocket or file folders, cloth bags).
- ☐ Where reusable items are not feasible, select products that are made from recovered materials and that also can be recycled.
- ☐ Other actions: _____

Educating Participants and Exhibitors

- ☐ Request the use of recycled and recyclable handouts or giveaways.
- ☐ Request that unused items be collected for use at another event.
- ☐ Encourage participants to recycle materials at the event.
- ☐ Reward participation by communicating environmental savings achieved.
- ☐ Other actions: _____

(Checklist adopted from the US EPA guidance "*It's Easy Being Green! A Guide To Planning And Conducting Environmentally Aware Meetings And Events*", EPA530-K-96-002, September 1996, https://depts.washington.edu/uwconf/resources/EPA_Green_Event_Checklist__gm-bklt.pdf)

LIST OF ACRONYMS

AOR: Agreement Officer's Representative
BEO: Bureau Environmental Officer
DCHA: Democracy, Conflict, and Humanitarian Assistance
EGSSAA: USAID Environmental Guidelines for Small-Scale Activities in Africa
IFRP: International Food Relief Partnership
GEF: United Nations Development Program Global Environmental Facility
MEO: Mission Environmental Officers
PERSUAP: Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP)
P-IEE: Programmatic Initial Environmental Evaluation
WHO: World Health Organization