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**US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE)
Building Healthy Families Project**

Project/Activity Data:

Activity/Project Title: Building Healthy Families Project (BHFP)		Solicitation #:N.A.
Contract/Award Number (if known): TBD		
Geographic Location: Pakistan; 391		
Originating Bureau/Office: USAID Pakistan, Office of Health, Population and Nutrition		
Supplemental IEE: ☐ Yes ☒ No Amendment: ☐ Yes ☒ No Programmatic IEE: ☐ Yes ☒ No	DCN and date of Original document: Asia Emerging Threats (COVID-19) Programmatic IEE: Asia 20-042, approved on April 09, 2020 ¹	
	DCN and ECD link(s) of Amendment(s): N.A	
	Amendment No.: NA	
Funding Amount: \$40,000,000		Life of Project Amount: \$40,000,000
Implementation Start/End: October 1, 2022, to September 30, 2027		
Prepared By: Sidra Ashraf (OHPN)		Date Prepared: February 1, 2022
Expiration Date (if any): August 24, 2023 ^{2,3}		Reporting due dates (if any): N.A.
Environmental Media and/or Human Health Potentially Impacted (check all that apply): None ☐ Air ☒ Water ☒ Land ☒ Biodiversity ☐ Human Health ☒ Other ☐		

¹ Available at: <https://ecd.usaid.gov/repository/pdf/52764.pdf>

² The Activity is aligned with the current Country Development Cooperation Strategy (CDCS), which is valid until August 24, 2023. The BHFP Activity IEE shall be amended as the new CDCS comes into force and in view of new Administration priorities for Pakistan USG efforts in Global Climate Change.

³ The public version of CDCS is available at: <https://www.usaid.gov/pakistan/cdcs>

Recommended Threshold Determination: ☒ Negative Determination ☒ with conditions ☒ Categorical Exclusion ☐ Positive Determination	☐ Deferral ☐ Exemption ☐ USG Domestic NEPA action
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Climate Change: ☒ GCC/Adaption ☐ GCC/Mitigation ☒ Climate Change Vulnerability Analysis (included) Adaptation/Mitigation Measures: Included as Section 4.0

US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE)
Building Healthy Families Activity

SUMMARY OF FINDINGS:

1.0 Background and Activity Description

1.1 Purpose and Scope of IEE

The purpose of this Initial Environmental Examination (IEE), in accordance with 22 CFR 216, is to provide a first review of the reasonably foreseeable effects on the environment, as well as recommend Threshold Decisions, for the **“Building Healthy Families Project,”** or the **“Activity”** based on the present design component of the Activity. This IEE provides a brief statement of the factual basis for a Threshold Decision as to whether an Environmental Assessment (EA) or an Environmental Impact Statement is required for the Activity.

1.2 Country Context

Pakistan has a population of about 220+ million people, making it the world’s 5th most populous country. The country has the lowest overall contraceptive prevalence rate at 34 percent compared to South Asian countries at 53 percent, whereas modern contraceptive use has stagnated at 25 percent in the past five years. With an unmet need for modern contraceptive methods of 17 percent, an estimated 3.8 million unintended pregnancies take place annually resulting in 2.6 million induced abortions occurring every year. Even though Pakistan has made substantial progress in maternal and child health (MCH) indicators according to the recent PDHS 2017 survey, the COVID-19 pandemic is putting immense pressure on the country's health system and is reversing the positive trend in all the MCH indicators. In addition, the pandemic has slowed down the family planning (FP) services that were already deteriorated due to lack of funding. Lockdowns and travel restrictions have caused severe shortages of life-saving medicines and vaccines, including shortages of contraceptive commodities with a stockout of 48 percent currently. The pandemic has caused nearly a 30 percent decline in routine FP services, along with a 52 percent reduction in immunization services. These statistics not only reflect a negative impact on the health of Pakistan's population, but also the grave implications for climate change, environmental impact, and social stability.

1.2.1 Lesson Learned

USAID’s current and past health systems strengthening projects have demonstrated that governance, capacity building, and other systems approaches can effectively improve Pakistan's public and private healthcare sectors at both the provincial and federal levels. USAID health programs have also shown that community-based interventions working with Lady Health Workers (LHW), engaging with men, and creating a link between the public and private sector, including communities, lead to stronger health systems. Moreover, locally led interventions that account for social and behavior change lead to more sustainable results and greater self-reliance. There is a

need to expand initiatives such as engaging with religious leaders, building the capacity of health care professionals, adopting technology-based Family Planning /Maternal, Newborn, and Child Health (FP/MNCH), and developing FP/MNCH models. Similarly, considerable efforts are needed to adequately address the staffing shortages and make services more accessible to underserved women and children. USAID recognizes that integrated, systems-based approaches for strengthening health systems are more critical now than ever due to COVID-19 and the threat of other pandemics.

1.2.2 Activity Background

USAID's Building Healthy Families Project (BHFP) is a five-year activity from 2022 to 2027, with a total estimated cost of \$40 million. The Mission's Country Development Cooperation Strategy (CDCS) Goal is a "More peaceful, prosperous and stable Pakistan." A key line of effort includes helping Pakistan to provide equitable basic services. BHFP will contribute to the Mission's CDCS goal by strengthening Pakistan's public institutions to provide improved FP/MNCH services, thus contributing to a more prosperous and stable Pakistan. This activity also aligns with the Pakistan Integrated Country Strategy Mission Objective 3.2, "Pakistani society is better educated, more skilled, inclusive, and healthy."

At the Development Objective level, the activity will directly contribute to the Special Objective (SpO) 'Strengthened Global Health Security Capacities in Pakistan,' by helping to build resilient health systems when faced with public health threats, including global pandemics. This activity will support efforts to prepare the health workforce, private sector, and civil society to provide quality essential health services, including FP and MNCH services, and prevent the spread of infectious diseases through building institutional capacity, strategic expertise, and community engagement and outreach. Currently, the SpO largely focuses on infectious diseases; moving forward, it will have components to build resilient, integrated health systems that are more aligned to this activity.

At the Agency level, the "Integrated Reproductive Health and Family Planning Activity," directly aligns with Objective 2d of [USAID's COVID-19 Strategy](#), "Mitigate negative effects on other essential health programs through targeted measures and investments and build resilient, integrated health-systems that can better respond to wider health needs and future biological threats."

1.3 Activity Description:

BHF aims to expand access to and utilization of quality FP/MNCH services in Pakistan to improve health outcomes for some of its most vulnerable populations. The activity will utilize a system-strengthening approach to fortify FP/MNCH services, focusing on supporting interventions such as policy, advocacy, human resources, and leadership and governance. This activity is also critical in addressing new challenges in FP/MNCH brought on by the COVID-19 pandemic, notably disruptions in service provision, the contraceptive supply chain, and staffing. The BHFP activity will serve as USAID's mechanism for providing technical assistance and support to the Government

of Pakistan (GoP) to accelerate efforts into meeting the country's commitments to achieving the Reproductive, Maternal, Newborn, Child and Adolescent Health Agenda and FP2030 goals, as well as help to mitigate the secondary health impacts of the COVID-19 pandemic. The activity has three main technical components as described below.

1.3.1 Component I: *Technical assistance to national and provincial governments to build resilient FP/MNCH health system*

This activity will provide technical assistance to public and private sector institutions to mobilize them and build their capacity, as they are responsible for achieving FP/MNCH results. By assisting the national and provincial governments to strengthen coordination between and implementation of population and health programs, Pakistan will improve the performance and resilience of its health system. Resilient health systems, combined with its commitment to a rights-based family planning approach, will also help the GoP to meet its goals to combat climate change and pandemics such as COVID-19. Illustrative interventions under this objective may include:

- Strengthen the capacity of public and private institutions to scale up FP high-impact practices such as postpartum FP, improved FP counseling and outreach, and premarital counseling programs to meet the needs of young married couples and men.
- Bolstering the capacity of the Health Care Commission to improve the regulation of private sector health providers to increase and expand quality FP service delivery.
- Exploring opportunities for the government's strategic purchasing of health care services through private sector providers.
- Strengthen provincial level systems to expand quality FP services through community-based providers, i.e., LHW and community midwives.
- Empowering institutions to advocate for expanded commitment for FP/MNCH as an approach to combat the climate crisis.
- Promoting strategies to deliver integrated FP/MNCH services, including managing and delivering services together, to maximize efficiency and increase service access and quality (for example, integrating FP messaging with antenatal care, immunization, and other services).

1.3.2 Component II: *Technical assistance to expand quality FP/MNCH products and services*

Expanding the contraceptive method mix is one way to increase clients' choice of contraceptive methods as well as contraceptive prevalence. The activity will support additional analysis and research to better understand and implement increased uptake of underutilized contraceptive methods, as well as expand access to FP services. This component will allow a limited-scale implementation of new or existing [FP High Impact Approaches/Practices](#) to improve access and expand contraceptive choices by improving the availability of contraceptive types, especially long-acting reversible methods, including the expansion of new methods of self-care technologies,

and improving opportunities in the health system. Illustrative interventions under this objective may include:

- Testing new or strengthening existing FP/MNCH service delivery approaches (i.e., digital innovations, FP counseling and follow up) for scale up.
- Engaging outreach workers to promote a more diverse method mix (i.e., traditional family planning, Sayana Press female contraception injections, female condoms, etc.).
- Working with the Population and Welfare Department to increase awareness and uptake of male contraceptive methods (i.e., vasectomy) using male mobilizers and trained providers.
- Expanding FP outlets through partnerships with clinics and pharmacies.
- Refurbishing health facilities (fixing broken windows, delivery beds, providing privacy curtains, painting health facilities, ensuring provision of basic furniture etc.) and resuming the delivery of quality basic health services and timely referral of complicated cases to higher level of facilities.
- Expanding COVID-19 vaccine coverage in marginalized groups (pregnant women and children).

1.3.3 Component III: *Deployment of targeted evidence-based behavior change interventions focused on youth and men*

This activity will support Component I and II. With 64 percent of the population under age 30, there is an urgent need to engage young people by developing tailored FP/MNCH strategies to meet the specific needs of different age groups. Male engagement and involvement is another critical high-impact practice that can lead to increased utilization of and support for FP/MNCH services. Premarital counseling has been identified in the National Action Plan as a priority intervention, as it can facilitate couples communication around reproductive health and the role of family planning and other essential health services in achieving a healthy and happy family. Illustrative activities include:

- Developing or strengthening youth-focused FP engagement and counseling models for community health workers and public and private sector health providers.
- Testing new and/or scaling up existing communication and empowerment approaches for youth and young couples.
- Testing new and/or scaling up existing high-impact practices that engage men (i.e., use of social media, community mobilizers, religious leaders).
- Engaging men through social media to promote sharing of household responsibilities and to better understand their role in COVID-19 vaccine promotion efforts.
- Protecting pregnant women and children by developing approaches to address fears and rumors related to vaccine safety and side effects, as well as the need to expand COVID-19 vaccine coverage in vulnerable populations.

1.4 Period of assignment/services

The planned implementation period is five years, starting on October 1, 2022, subject to the availability of USG funds. The proposed IEE is aligned with the current USAID Pakistan CDCS⁴, ending on August 24, 2023. This IEE shall be amended as the new CDCS comes into force and in view of changing US Administration priorities for Pakistan and the USG global climate change efforts. The amended IEE shall cover the remaining period of performance for this activity.

1.5 Activity Budget and Deliverables

The total maximum estimated cost over the life of the activity is \$40 million.

2.0 COUNTRY ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

Pakistan is the 33rd largest country in the world, spanning 79.6 million hectares (Government of Pakistan 2016). It is also the sixth most populous country with 207 million people, of which 61 percent reside in rural areas and 39 percent in urban areas. It is a middle-income country with a per capita gross domestic product of \$1,468 in 2016. Pakistan is mainly a dry land, with 80 percent of its land in arid and semiarid zones. It has a continental type of climate characterized by extreme variations of temperature, seasonally and daily. Pakistan is one of the countries that is most vulnerable to climate change. The Global Climate Risk Index from 1996 to 2015 prepared by German Watch found Pakistan the seventh most affected country in the world. The National Disaster Management Authority reports that extreme climate events (1994–2013) caused \$4 billion per year in economic losses (Government of Pakistan 2016). The last five floods (2010–2014) resulted in monetary losses of more than \$18 billion, with 38.12 million people affected, 3.45 million houses damaged, and 10.63 million acres of crops destroyed (Government of Pakistan 2016).⁵

Studies conducted by the GoP, USG, and donor agencies^{6,7,8} in Pakistan have highlighted several environmental issues. Broadly, the areas of concern identified include uncertainty and climate variability in the design and operation of water resources projects, potential climate impacts and stress points on the energy sector, water availability for energy and food, climate change impacts on the energy sector, Indus River Basin flood management, energy, pollution, waste management, irrigated agriculture, and biodiversity. Conservative estimates presented in a World Bank report suggest that environmental degradation costs the country at least six percent of Gross Domestic Product (GDP), and these costs fall disproportionately upon the poor.⁹

⁴ The public version of CDCS is available at: <https://www.usaid.gov/pakistan/cdcs>

⁵ The World Bank 2018 Report, FORESTS FOR GREEN PAKISTAN: FOREST POLICY NOTE, available at: <https://openknowledge.worldbank.org/handle/10986/30936>

⁶ Opportunities for a Clean and Green Pakistan- A country Environmental Analysis World Bank 2019, available at: <https://openknowledge.worldbank.org/handle/10986/32328>

⁷ The World Bank In Pakistan available at: <https://www.worldbank.org/en/country/pakistan>

⁸ Climate Change Profile of Pakistan 2017 Report, available at: <https://www.adb.org/publications/climate-change-profile-pakistan>

⁹ Opportunities for a Clean and Green Pakistan- A country Environmental Analysis World Bank 2019, available at:

The main environmental sustainability challenges in Pakistan are: (i) managing air and water pollution; (ii) managing land and water sustainably (the agriculture and water nexus); and (iii) building resilience to natural disasters. The Environmental Performance Index (EPI) by Yale University ranks Pakistan 176 out of 180 countries in terms of air quality. On the EPI, Pakistan ranks 140 out of 180 countries in water and sanitation, with only 36 percent of the population having access to safely managed drinking water. Water demand is projected to grow by at least 40 percent over the next 30 years. Between 16 and 32 percent of the increase in water demand by 2050 could be attributable to climate change, primarily because of higher water requirements in agriculture. Climate change compounds environmental and development challenges. In the absence of adaptation, climate change will have profound implications for growth in Pakistan, leading to annual GDP losses of up to 1.2 percent by 2050 (Davies et al., 2016), and for poverty reduction, pushing between 5.7 and 21.4 million additional people into poverty by 2050. Poorer populations tend to be more exposed to disasters, suffering higher relative losses to their assets and livelihoods.¹⁰

Pakistan's stressed water situation, environmental degradation, natural disasters, and climate change-associated risks threaten sustainability, and point to the need to institute urgent adaptation and mitigation measures.¹¹

Pakistan's water insecurity arises not from insufficient water, but from inefficient water management and use, and from poor delivery of irrigation and municipal water services. Collectively, these comprise the social, environmental, and economic outcomes that Pakistan gets from its very considerable water resource. The National Water Policy needs to proactively engage provincial and federal frameworks to make Pakistan more water secure and to enable the country to reach upper middle-income status by 2047.¹²

The country's development model has failed to address the environmental challenges related to the unsustainable use of natural resources. High rates of population growth, the wasteful use of water in agriculture, rapid urbanization, and Pakistan's vulnerability to climate change raise risks for the depletion of water resources, increased air and water pollution, and a greater incidence of natural disasters. Pakistan is ranked fifth on the Global Climate Risk Index of countries most affected by climate change between 1999 and 2018, and the country is increasingly vulnerable to natural hazards, particularly floods, cyclones and droughts. In the absence of adaptation measures and fundamental changes to Pakistan's growth model, climate change will compound existing

<https://openknowledge.worldbank.org/handle/10986/32328>

¹⁰ "World Bank. 2019. Pakistan@100: Shaping the Future. World Bank." available at:

<https://openknowledge.worldbank.org/handle/10986/31335#:~:text=Pakistan%40100%20seeks%20to%20identify,decade%20will%20determine%20Pakistan's%20future.>

¹¹ ADB's Country Partnership Strategy, Pakistan, 2021–2025 —Lifting Growth, Building Resilience, Increasing Competitiveness, available at:

[https://www.adb.org/documents/pakistan-country-partnership-strategy-2021-2025#:~:text=ADB's%20assistance%20over%20the%20next,being%2C%20and%20\(jii\)%20boosting](https://www.adb.org/documents/pakistan-country-partnership-strategy-2021-2025#:~:text=ADB's%20assistance%20over%20the%20next,being%2C%20and%20(jii)%20boosting)

¹² The World Bank Report, "Pakistan: Getting More from Water." Published in 2019, available at:

<https://openknowledge.worldbank.org/handle/10986/31160>

environmental and development challenges.¹³

The forest cover in Pakistan is low. The latest forest assessment from 2011 estimates 4.47 million ha of total forest area in the country, or 5.1 percent of the total land area. Distribution of forests varies by province and other administrative area; it is highest in Khyber Pakhtunkhwa (32.7 percent), followed by Sindh (14.8 percent), Punjab (12.4 percent), Newly Merged Tribal Districts (11.9 percent), Balochistan (11.1 percent), Azad Kashmir (9.6 percent), and Gilgit Baltistan (7 percent).¹⁴

Given its range of latitude and immense variations in altitude, Pakistan spans a number of the world's ecological regions that encompass a variety of habitats supporting rich biodiversity. However, several animal and plant species are currently threatened and/or endangered, largely because of overexploitation and loss of natural habitat, exacerbated by pressures stemming from rapid population growth, persistent poverty, and climate change impacts.¹⁵

Pakistan has gradually established several national strategies and policies, relatively comprehensive legal and regulatory frameworks, and specialized institutional structures focusing on environmental protection. The Federal Ministry of Climate Change, established in 2012, is vested with the mandate to comprehensively address disaster management, along with spearheading national climate change initiatives both in adaptation and mitigation. It is also responsible for facilitating and harmonizing environmental standards, laws, acts and policies at the national level, to develop national strategies and action plans to fulfill international obligations under various Multilateral Environmental Agreements (Conventions, Protocols, Treaties, etc.).

3.0 LEGISLATIVE AND REGULATORY FRAMEWORK

3.1 National Environmental Policies and Legislation¹⁶

3.1.1 Pakistan Environmental Protection Act 1997¹⁷

The Pakistan Environmental Protection Act, 1997 is the basic legislative tool empowering the GoP to frame regulations for the protection of the environment.

3.1.2 Pakistan IEE/Environmental Impact Assessment (EIA) Regulation, 2000^{18,19}

The review of the 2000 IEE and EIA regulations (the regulations) provides the necessary details on the preparation, submission, and review of IEE and the EIA reports. The regulation classifies projects based on their expected degree of adverse environmental impacts and lists them in two

¹³ LEVELING THE PLAYING FIELD, Systematic Country Diagnostic, 2020 The World Bank Document , available at: <https://openknowledge.worldbank.org/handle/10986/34549?locale-attribute=en>

¹⁴ The World Bank 2018 Report, FORESTS FOR GREEN PAKISTAN: FOREST POLICY NOTE, available at: <https://openknowledge.worldbank.org/handle/10986/30936>

¹⁵ Forest Area-(% of Land Area Pakistan) World bank DataBase, available at <https://data.worldbank.org/indicator/AG.LND.FRST.ZS?locations=PK>

¹⁶ <https://www.environment.gov.pk/>

¹⁷ <http://www.environment.gov.pk/act-rules/Brief-PEPA-Act1997.pdf>

¹⁸ <http://www.environment.gov.pk/act-rules/IEE-EIA-REG.pdf>

¹⁹ <https://www.environment.gov.pk/> with links to provincial offices with environment responsibilities

separate schedules.

3.1.3 National Environmental Quality Standards (NEQS) 2000²⁰

First promulgated in 1993, the NEQS were last amended in 2000. They constitute the basic guidelines with which liquid effluent and gaseous emissions of municipal and industrial origin must comply. These standards present the maximum allowable concentration for liquid effluent before its discharge into the sea, inland water and sewage (total 32 parameters with which to comply), and gaseous emissions in the ambient air from industrial sources (total 16 parameters with which to comply).

3.1.4 National and Provincial Legislations on Occupational Health and Safety (OHS)²¹

Pakistan Occupational Health and Safety Act 2018 (Draft)²¹ is in draft form and has not been approved yet. The main law governing OHS in Pakistan is the Factories Act of 1934 (as amended). The Hazardous Occupation Rules of 1978 designate certain occupations as hazardous and contain special provisions to regulate working conditions in these occupations. Additionally, other laws dealing with OHS include: The Mines Act (1923), Social Security Ordinance (1965), Workmen's Compensation Act (1923), Shop and Establishment Ordinance (1969), the Dock Laborer Act (1934), and Sindh Occupational Health & Safety Act 2017. Additionally, the Hazardous Substances Rules (2003) cover worker safety and the use of hazardous substances in the workplace. The [Public Health Laws of Pakistan](#) includes a detailed list of Preventive, Curative, Rehabilitative and other laws related to public health.

3.1.5 Building Codes / Seismic Standards

Pakistan is one of the most seismically active countries in the world. Following the devastating October 2005 earthquake, on August 26, 2007, the new Pakistan Building Code²¹ went into effect throughout the country. All structures and new buildings, including residential, industrial, and commercial, particularly high-rise buildings, are required to follow the requirements of the Code, about its seismic provisions.

3.1.6 Local Government Ordinance, 2001

This Act empowers the GoP and provincial governments to enforce laws for land use, conservation of natural vegetation, air, water, and land pollution, disposal of solid waste and wastewater effluent, and public health and safety, including some provisions for environmental protection. Section 93 of this Ordinance pertains to environmental pollution under which the local councils are authorized to restrict activities causing pollution to air, water, or land.

²⁰ <http://www.environment.gov.pk/NEQS/SRO549%20I2000-NEQS.pdf> covers liquid industrial effluents

²¹ https://www.pec.org.pk/building_code_pakistan.aspx

3.2 Provincial Environmental Policies and Legislation

3.2.1 Khyber Pakhtunkhwa Province

3.2.1.1 The KP Environmental Protection Act, 2014

After enactment of the 18th amendment to the Pakistan Constitution, the Khyber Pakhtunkhwa Provincial Government enacted its own environmental law. The Khyber Pakhtunkhwa Environmental Protection Bill, 2014 was signed by the governor of Khyber Pakhtunkhwa on 4th December 2014 as an Act of the Legislature of Khyber Pakhtunkhwa.

3.2.2 Sindh Province

3.2.2.1 The Sindh Environmental Protection Act, 2014

After enactment of the 18th amendment to the Pakistan Constitution, the Sindh Provincial Government enacted its own environmental law. The [Sindh Environmental Protection Act, 2014](#) was signed by the governor of Sindh on 19 March 2014 as an Act of the Legislature of Sindh.

3.3 International Environmental Treaties Ratified by Pakistan

Pakistan is a signatory to several international environmental agreements, International Labor Organization, and World Health Organization conventions. These agreements cover very broad areas, from biodiversity and genetic resources, protected areas, climate change, and international trade, to a range of labor and health conventions. Multilateral Environmental Agreements (MEAs) impose requirements and restrictions of varying degrees upon the member countries in order to meet the objectives of the agreements. However, the implementation mechanism for most of these MEAs is weak in Pakistan, and the institutional framework needs strengthening. The following are the relevant international treaties and conventions that have been ratified by Pakistan:

1. Vienna Convention on protection of ozone layer; and Montreal Protocol on ozone layer depleting substances. Pakistan Ratified: 1992
2. UN Convention to Combat Desertification (UNCCD). Pakistan Ratified: 1997
3. Kyoto Protocol to the United Nation Framework Convention on Climate Change (UNFCCC). Pakistan Ratified: 2005
4. Rotterdam Convention on the Prior Informed Consent (PIC) Procedure for Certain Hazardous Chemicals and Pesticides in International Trade. Pakistan Ratified: 2005
5. Stockholm Convention on Persistent Organic Pollutants (POPs). Pakistan Ratified: 2008
6. United Nations Framework Convention on Climate Change, Paris Agreement – April 22, 2016
7. Declaration on Control and Prevention of Air Pollution and its Likely Trans-boundary Effects for South Asia. Pakistan Endorsed - April 1998
8. Forced Labor Convention, 1930 (No. 29), Ratified on 23 December 1957
9. Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87), Ratified on 14 February 1951
10. Right to Organize and Collective Bargaining Convention, 1949 (No. 98), Ratified on 26 May 1952
11. Equal Remuneration Convention, 1951 (No. 100), Ratified on 11 October 2001
12. Abolition of Forced Labor Convention, 1957 (No. 105), Ratified on 15 February 1960

13. Discrimination (Employment and Occupation) Convention, 1958 (No. 111), Ratified on 24 January 1961
14. Minimum Age Convention, 1973 (No. 138), Minimum age specified: 14 years, Ratified on 6 July 2006
15. Worst Forms of Child Labor Convention, 1999 (No. 182), Ratified on 11 October 2001
16. Labor Inspection Convention, 1947 (No. 81), Ratified on 10 October 1953
17. Tripartite Consultation (International Labor Standards) Convention, 1976 (No. 144), Ratified on 25 October 1994
18. Convention prohibiting environmental modification techniques (ENMOD), 1976, Ratified on 27 February 1986

3.4 USAID Environmental Compliance Requirements

United States Government laws require that all activities financed by USAID shall comply with the requirements of U.S. law 22 CFR 216 and stipulations in relevant ADS. Ensuring that USAID projects do not result in significant environmental and social impacts is guided by several actions, including arriving at a threshold decision in an IEE, developing monitoring and mitigation procedures, and including environmental compliance requirements in contracts, grants, cooperative agreements, and other project authorization documents (such as Activity Agreements for Government-to-Government projects). All environmental compliance requirements of U.S. law 22 CFR 216 as explained in this IEE shall be included and reflected in all sub-contracts, sub-grants, and sub-agreements under the Project.

To promote pesticide safety, USAID environmental regulations require the preparation of a Pesticide Evaluation Report and Safe Use Action Plan (PERSUAP) for any pesticide or chemical that is used as a pesticide. USAID prepared a program level PERSUAP for its activities in Pakistan. Certain waste materials may contain chemicals that are regulated by the PERSUAP. In case a need arises for pesticide use or recommendation, the Project will follow the Bureau Environmental Officer/Asia (BEO/Asia) approved “2017 Pakistan Programmatic PERSUAP (2017 PERSUAP),” as amended, provided at: <https://ecd.usaid.gov/repository/pdf/50829.pdf>

4.0 CLIMATE CHANGE INTEGRATION

4.1 Country Climate Change Information (Baseline Information)^{22,23}

According to USAID/Pakistan FAA 118/119, Climate Change, and Ecosystem Services Assessment, and the Global Climate Risk Index (2017), Pakistan is one of the ten countries most affected by climate change and is highly vulnerable to future impacts. The Climate Risk

²² Global Climate Risk Index 2017, available at:

https://germanwatch.org/sites/default/files/Global%20Climate%20Risk%20Index%202021_1.pdf

²³ USAID/Pakistan FAA 118/119, Climate Change, and Ecosystem Services Assessment Pakistan Climate Vulnerability Profile available at: https://ecd.usaid.gov/faa/source/Pakistan_2017.pdf

Management Matrix completed for Pakistan's CDCS²⁴ has also identified considerations of further steps for climate change adaptation at activity and project design level.

4.2 USAID Climate Risk Management Requirements

In the revised ADS 201, dated January 23, 2017, Climate Risk Management is a required analysis for new projects (ADS 201.3.3.13) and activities (201.3.4.5). The Mandatory Reference for ADS Chapter 201, Climate Risk Management for USAID Projects and Activities, dated October 12, 2016, outlines the process and provides tools for doing so.

4.3 Project Activities and Recommended Climate Risk Management Actions

The activity design team used USAID's "Climate Risk Screening Tool" to assess the potential climate risks for the activity. Activity components will take place in many different parts of Pakistan, and activities are largely focused on technical assistance and capacity building. The assessment considered the potential impacts of climate (temperature, drought, precipitation and flooding, sea-level rise, storm surges, and other storms), in the focused geographical areas, over a 10-year time frame.

The climate risk analysis concluded that this activity poses low to moderate risk for all the listed components of the activity. A summary of the conclusions from the analysis is presented in Table 1 below.

²⁴ The public version of CDCS is available at: <https://www.usaid.gov/pakistan/cdcs>

Table 1: Activity-Level Climate Risk Management Summary Table

1.1: Tasks / Defined or Anticipated Tasks or Interventions	1.2: Time-frame	1.3: Geography	2: Climate Risks	3: Adaptive Capacity	4: Climate Risk Rating	5: Opportunities	6.1: Climate Risk Management Options	6.2: How Climate Risks are Addressed in the Activity	7: Next Steps for Activity Implementation	8: Accepted Climate Risks
<i>Technical assistance to national and provincial governments to build resilient FP/MNCH health system</i>	0-10 years	Selected districts of Sindh and KP with possibility of extension nationwide.	Flooding, drought and extreme weather conditions could affect the delivery and disruption of quality services at health facilities.	Government is increasing institutional and human capacity in the National Disaster Management Authority (NDMA), Provincial Disaster Management Authority (PDMA) and other related organizations including health	Low	The activity will enhance the capacity of the government for integrating climate risks and alternative strategies into emergency response action plans to mitigate the climatic	A risk mitigation plan will be developed that will integrate climatic risks in schedules of meeting, site selection, and intervention implementation plans.	N/A	N/A	NIL

Technical assistance to expand quality FP/MNCH products and services	0-10 years	Selected districts of Sindh and KP with possibility of extension nationwide.	Flooding, drought and extreme weather conditions.	Government is increasing institutional and human capacity in the NDMA, PDMA and other related organizations including health and population departments for a multi-sectoral response to mitigate climate	Moderate	and population departments for a multi-sectoral response to mitigate climate risk. Government is open for any support from donors to improve capacity.	risks so the health system can continue to be efficient and responsive to improve population health in an unstable and changing climate.	A risk mitigation plan will be developed that will integrate climatic risks in schedules of meeting, site selection, and intervention implementation plans.	The identification of climatic risks such as heavy rains, flooding, drought, and extreme weather conditions will ensure integrating climate-smart approaches	Opportunities and challenges will be incorporated into annual and LOP work plans for technical and material assistance packages	NIL

DCN:

IEE for Building Healthy Families Project (BHFP)

[illegible]

5.0 PROJECT ACTIVITIES AND RECOMMENDED THRESHOLD DECISIONS & MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION):

This IEE provides a basis for relevant **Threshold Decision** for the activity components to ensure environmental compliance in accordance with Regulation 22 CFR 216 and ADS 204 and provides for an environmental screening and review process to be integrated into activity implementation activities and delegation of environmental review responsibility to Missions. It is a desk study that recommends which activities require further review and which do not. It allows for future amendments of the IEE, as new activities are included, or existing ones are extended or canceled. The IEE recommends procedures to follow to bring all activities into compliance. The USAID/Pakistan staff and activity implementing partners are responsible for continuous monitoring and evaluation of activities to ensure they remain in compliance.

All sub-activities shall be aware of and implemented in compliance with the ASIA EMERGING THREATS (COVID-19) Programmatic IEE: Asia 20-042, approved on April 09, 2020 (<https://ecd.usaid.gov/repository/pdf/52764.pdf>) as warranted, and use guidelines provided therein (attached) in view that on-going activities, implementing partners, and ultimate beneficiaries may be affected by COVID-19 virus.

The following determinations are recommended:

5.1 Recommended Threshold Decisions

5.1.1 Categorical Exclusion as per 22 CFR 216.2(c)(2)(i), (iii) and (v): (\$35 million/87.5%)

It is recommended for the BHFP implementation related to all those proposed actions that do not have an effect on the natural or physical environment. *The life of project value for the sum of these activities is not to exceed \$35 million (approximately 87.5% of LOP amount).* Such activities/proposed actions may include the following:

- Activity management and other such administrative sub-activities,
- Technical assistance, capacity building or training activities [22CFR216.2(c)(2)(i)],
- Analyses, investigations, reviews, assessments, planning, studies (monitoring, impact evaluation and other social technical studies etc.), surveys, mapping, workshops, seminars, conferences, and meetings [22CFR216.2(c)(2)(iii)],
- Document and information transfers [22CFR216.2(c)(2)(v)],
- Information and experience sharing sessions, public awareness campaigns, media campaigns, advocacy campaigns, and public information campaigns [22CFR216.2(c)(2)(iii)],
- Development of manuals and documents etc., [22CFR216.2(c)(2)(iii)],
- Activities which have no potential environmental impacts, including those activities not requiring a BEO/Asia approved EA according to USAID procedures or EIA according to Pakistan Environment laws. The USAID environmental procedures are governing in this case.

5.1.2 Negative Determination with Conditions per CFR 216.3(a)(2)(iii): (\$5 million/12.5%)

A Negative Determination with Conditions (NDC) is recommended for all other activities undertaken in the BHFP that are not listed above for which a Categorical Exclusion is recommended. The activities qualifying for an NDC are further defined in Section 5.4, Summary Threshold Determinations, Table 2, in this IEE. These activities may have potentially minor to moderate adverse impacts on the physical and natural environment. ***The life of project value for the sum of these activities is not to exceed \$5 million (12.5% of LOP amount).*** These activities are recommended for **Negative Determination with Conditions (NDC)** per 22 CFR 216.3(a)(2)(iii); the **Threshold Decision Conditions** are described in detail in Section 5.1.2, 5.2, and 5.3. The interventions with NDC determination will require development of an Environmental Mitigation and Monitoring Plan (EMMP). An Environmental Documentation Form (EDF) shall be developed for each infrastructure sub-activity. In preparing the EDFs, the partner will identify potential adverse environmental risks and impacts and recommend mitigation measures.

All activities that warrant a ***Negative Determination with Conditions*** must meet the following conditions:

- A *site and route-specific* EDF and EMMP identifying potential adverse environmental risks and impacts, mitigation measures, monitoring and inspection schedule, and entities required to insure compliance with the EMMP must be developed and approved by the Agreement Officer Representative (AOR) and Mission Environmental Officer/Climate Integration Lead (MEO/CIL) prior to commencement of an NDC activity. Monitoring and mitigation activities must be incorporated into Project Annual Work Plans and Performance Monitoring Plans. Templates for the EDF and EMMP are available. Previously developed environmental manuals may be adapted to the scope of work of activities, as appropriate, to include EMMP
- If a completed EDF indicates the potential for a significant adverse environmental and social impacts, an Environmental Scoping Statement and an Environmental Assessment (EA) will be developed in consultation with the MEO/CIL and with a concurrence of the Regional Environmental Advisor (REA) - Central & South Asia (SCA), Afghanistan and Pakistan. The process will follow the requirements of 22 CFR 216.6 and will involve: 1) developing a scope of work for an environmental scoping statement to be reviewed and approved by the BEO/Asia; 2) scoping shall involve public consultation with potentially affected people and key relevant stakeholders; 3) Scoping Statement shall be reviewed and approved by the BEO/Asia; 4) draft EA report shall be subject to: public consultation with potentially affected people and key relevant stakeholders, and review and approval by duly national and/or provincial environmental authority; 5) EA report shall be reviewed and approved by the BEO/Asia; 6) findings and recommendations of the EA report with an EMMP shall be presented in an amendment to this IEE, duly reviewed and approved in the Mission and by the BEO/Asia.
- Quarterly reports will include a section entitled environmental compliance that provides

details on indicators, mitigation efficacy, and unintended environmental consequences of activities.

The following additional references may help in the preparation of EDFs and their EMMPs.

a) Environmentally Sound Design (ESD) Sector Environmental Guidelines, USAID. The Sector Environmental Guidelines series directly support environmental compliance by providing information essential to assessing the potential impacts of activities, and to the identification and detailed design of appropriate mitigation and monitoring measures.

<https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/sector-environmental-guidelines-resources>

b) Guidance Manual for Developing Best Management Practices, USEPA – Best management practices (BMPs) are recognized as an important part of controlling releases of pollutants to receiving waters and reduce costs as well as pollution risks through source reduction and recycling/reuse techniques. <https://www3.epa.gov/npdes/pubs/owm0274.pdf>

c) International Finance Corporation (IFC) Environmental, Health and Safety Guideline at: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

d) European Bank for Reconstruction and Development (EBRD) Sub-Sectoral Environmental and Social Guidelines at: <https://www.ebrd.com/downloads/policies/environmental/anfeed.pdf>

The implementer will use environmentally sound designs, specifications, and materials; monitor and evaluate environmental impacts during implementation; follow environmental impact mitigation measures detailed in the EMMP; use international BMPs acceptable to USAID; and submit to USAID reporting as detailed in the site specific EMMP. All applicable GoP environmental requirements will be satisfied prior to commencement of work, during implementation, and as required post-commissioning.

5.2 Additional Conditions

5.2.1 USAID AOR Responsibility

The USAID AOR shall ensure that:

- a) During implementation of activities, compliance reporting is completed and submitted to the USAID AOR for information according to the agreed schedule.
- b) All activity work plans include the required compliance/mitigation measures, including the appropriate IEE references, and progress reports must discuss status and compliance actions.

- c) AOR, together with the MEO/CIL shall explain and clarify environmental conditions and compliance procedures established in this IEE and the Contract.
- d) All conditions, limitations, and stipulations for revisions are fully transposed into relevant procurement instruments.
- e) All environmental compliance requirements of U.S. law 22 CFR 216 and all environmental conditions, limitations, and stipulation for revisions established in this IEE, shall be duly transposed into relevant procurement instruments, the Request for Application, and all sub-contracts.
- f) USAID AOR shall ensure gender is being effectively taken into account in activity implementation, in accordance with the terms of the award and Gender Equality and Female Empowerment (GEFE) requirements found in ADS 205, Mission Order-200.7 (Implementation of Policy on GEFE).
- g) USAID AOR must follow the [ADS Reference 201maw: Management of Construction Risk](#) for all construction related components of the activity.
- h) USAID AOR must ensure compliance with the [ADS Chapter 303: Grants and Cooperative Agreements to Non-Governmental Organizations](#) on all applicable components of activity
- i) AOR monitors the implementer's processes and required reporting of inspections as per the IEE to ensure compliance with 22 CFR 216 requirements throughout the life of the Agreement.

5.2.2 Implementing Partner (IP) Responsibility

The IP shall ensure that:

- a) All activities are implemented in accordance with Pakistani environmental, OHS codes, and construction regulations, standards, norms and guidelines, and national obligations under ratified international environmental agreements (see: <http://www.environment.gov.pk>), and in their absence in accordance with the best international practice appropriate to the seismicity and flood conditions in Pakistan, and in respective districts. These should be acceptable to USAID.
- b) The IP shall include environment compliance considerations in all aspects of project implementation and shall promote and train local counterparts on environmental requirements and standards across all the project's activities. Such proposed activities shall be included in annual work plans, and results shall be reported in annual reports.
- c) The IP shall have adequate funds to implement environmental mitigation and monitoring measures and shall have qualified, AOR and MEO-approved environmental impact professional(s) who shall assess and recommend environmental actions to be taken by the project and shall coordinate implementation of mitigation measures, monitoring, and reporting.
- d) The IP shall minimize the use of, and properly dispose of, hazardous materials and wastes for all project activities. The Implementers shall adhere to US Environmental Protection Agency (EPA) guidance at <https://www.epa.gov/asbestos> and <https://www.epa.gov/lead> for

- dealing with asbestos and lead.
- e) All environmental conditions established in this IEE shall be duly transposed into the Cooperative Agreement, and all sub-contracts and sub-agreements.
 - f) The IP shall document and regularly report to USAID on implementation of NDC activities. All Environmental Compliance Reports shall provide details on indicators, mitigation efficacy, and unintended environmental consequences of activities. All inspection reports made by the IP must be in writing, signed by the IP's representative.
 - g) The IP must ensure compliance with the USAID's GEFE Policy, ADS 205, and Mission Order-200.7.
 - h) The IP must comply with the [ADS Reference 201maw: Management of Construction](#) for all construction related components of the activity.
 - i) The IP must comply with the [ADS Chapter 303: Grants and Cooperative Agreements to Non-Governmental Organizations](#) on all applicable components of the Activity.
 - j) IP shall use and implement relevant conditions from [Asia Emerging Threats \(COVID-19\) Programmatic IEE: Asia 20-042](#)
 - k) This clearance is granted on the condition that all mitigation and monitoring measures specified in the environmental review are binding requirements.

5.3 Summary Threshold Determinations

A summary of the Threshold Determinations for the project activities are presented in Table-2 below.

Table-2: Summary Threshold Determinations for Activity Interventions

Activities	Effects on natural or physical environment	Determination and Regulation 216 action required
Categorical Exclusion		
- Project / Activity Management and monitoring - Technical assistance, capacity building, education, training programs (except to the extent such programs include activities directly affecting the environment). - Financial, accounting, management, and other capacity building.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
- Analysis, studies, workshops and meetings. - Development of manuals and documents etc. - Studies required to support activities of the program.	No adverse effect on the natural or	Categorical Exclusion per 22 CFR 216.2(c)(2)(iii)

• Surveys, mapping, workshops, seminars, conferences, meetings, consultations, GIS mapping, policy and reform assistance. • Preparation of environmental documentation including environmentally required studies.	physical environment.	
• Document and information transfer • Public awareness/communication/outreach campaigns, media campaigns, advocacy/information campaigns and public information campaigns.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(v)

Negative Determination

Provision of office equipment, computers, IT equipment, multimedia health equipment, electronic equipment etc.	Minor to moderate adverse effects on the natural or physical environment.	Negative Determination per 22 CFR 216.3 (a)(2)(iii) The recipient shall properly manage and dispose of equipment (equipment, tools, machine, computers, IT equipment, multimedia equipment, laboratory equipment, electronic equipment etc.) when its useful life ends. All such equipment shall be disposed of in an environmentally safe manner by a certified company in accordance with Pakistani laws, and in their absence, in accordance with international best practices acceptable to USAID (alternatively, when procuring equipment from a licensed provider/dealer an agreement may be reached that such equipment shall be returned to the dealer for its environmentally safe disposal). For procurement of electronic and miscellaneous equipment and furniture, the Implementers shall adhere to USAID's general policies on commodity eligibility, ADS 312, provided at https://www.usaid.gov/ads/policy/300/312 and shall not finance unsafe or ineffective products, such as certain pesticides, food products, or pharmaceuticals and other commodities not eligible for financing under this policy. To promote pesticide safety, USAID environmental regulations require the preparation of a Pesticide Evaluation Report and Safe Use Action Plan (PERSUAP) for any pesticide or chemical that is used as a pesticide. Certain waste materials may contain chemicals that are regulated by the PERSUAP. USAID prepared a program level PERSUAP for its
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		activities in Pakistan. In case a need arise for PESTICIDE procurement, use, and/or recommendation, the project shall follow the BEO/Asia -approved "2017 Pakistan Programmatic PERSUAP (2017 PERSUAP), as amended, provided at: https://ecd.usaid.gov/repository/pdf/50829.pdf
Negative Determination with Conditions		
Technical assistance to national and provincial governments to build resilient FP/MNCH health system		
- Scale up high-impact practices including activities involving social science, implementation, health services and operational research which may include the management of medical waste and or health commodities. - Technical assistance and health training involving management of medical waste and or health commodities. - Technical assistance to public and private health facilities to increase access to delivery of healthcare services.	Minor to moderate adverse impact on the natural and physical environment.	Negative Determination with Conditions per 22 CFR 216.3(a)((2)(iii), the Threshold Decision Conditions being: Please refer to Section 5.1.2, 5.2, and 5.3 for a detailed list of conditions.
Technical assistance to expand quality FP/MNCH products and services		
- Testing new or expanding existing healthcare service delivery approaches (i.e., digital innovations, telemedicine, new contraceptive methods) to facilitate implementation at large scale. - Expanding contraceptive options for males including promoting use of vasectomy. - Small scale refurbishments (fixing broken windows, delivery beds, providing privacy curtains, painting health facilities, ensuring provision of basic furniture etc.) including establishing and or strengthening of COVID-19 vaccination centers in remote locations.	Minor to moderate adverse impact on the natural and physical environment.	Negative Determination with Conditions per 22 CFR 216.3(a)((2)(iii), the Threshold Decision Conditions being: Please refer to Section 5.1.2, 5.2, and 5.3 for a detailed list of conditions.

**BHFP does not include activities involving use of pesticides or vector control Construction, installation, or operation of incinerators*

6.0 LIMITATIONS OF THE IEE

This assistance does not cover activities involving:

- a) Assistance, procurement, or use of genetically modified organisms will require preparation of a biosafety assessment (review) in accordance with ADS 211.3.5²⁵ in an amendment to the IEE reviewed by the Agency Biosafety Review Advisor and concurrently approved by BEO/Asia.
- b) Assistance, procurement, or use of non-native, potentially invasive species of flora and fauna will require preparation of an appropriate assessment and an amendment to the IEE reviewed and approved by BEO/Asia.
- c) Procurement or use of Asbestos, Lead and Mercury Containing Materials, i.e., piping, roofing, etc., Polychlorinated Biphenyls (PCB) or other toxic/hazardous materials prohibited by the US EPA as provided at: <https://www.epa.gov/asbestos>, <https://www.epa.gov/lead>, <https://www.epa.gov/mercury> and/or under international environmental agreements and conventions (e.g. Stockholm Convention on Persistent Organic Pollutants as provided at: <http://www.pops.int/>
- d) USAID/Pakistan restricts the use of USAID funds, directly or indirectly, to produce, acquire, use, transport, store, sell, or otherwise deal with ammonium nitrate and calcium ammonium nitrate for agricultural or rehabilitation and renovation activities and construction/demolition purposes.

Any of these actions would require an amendment to the IEE duly approved by the BEO/Asia.

7.0 REVISIONS

In accordance with 22 CFR 216.3(a)(9,) if the scope of an activity under approved NDC is revised or new information becomes available, which indicates that a proposed action might be "major" and its effects "significant," the NDC determination will be reviewed and revised by the originator(s) of the activity and submitted through the MEO/CIL and REA to BEO/Asia review and concurrence. If warranted, an EA will be launched, and a scoping statement and environmental assessment report prepared. The scoping and EA process, if determined necessary during scoping, will follow and comply with 22 CFR 216.3(a)(4). It is the responsibility of the AOR to inform the MEO/CIL and BEO/Asia of any changes in the scope and nature of approved activities, which may warrant the revision of the approved threshold decisions, in a timely manner.

Attachment: ASIA and EMERGING THREATS (COVID-19) Programmatic IEE: Asia 20-042, approved on April 09, 2020 (available at: <https://ecd.usaid.gov/repository/pdf/52764.pdf>)

²⁵ <https://www.usaid.gov/sites/default/files/documents/1867/211.pdf>

**US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE)
Building Healthy Families Project (BHFP)**

CLEARANCE / APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

OHPN, Office Director: _____ e-cleared _____ Date: 02/03/2022
Enilda Martin

Mission Environmental Officer and: _____ e-cleared _____ Date: 02/03/2022
Mission Climate Integration Lead Mohammad Anwar Afridi

Regional Environmental Advisor: _____ Cleared via email ([attached](#)) Date: 02/08/2022
Central & South Asia (SCA), Andrei Barannik
Afghanistan and Pakistan, Asia Bureau

Program Office Director: _____ e-cleared _____ Date: 2/10/2022
Monica Pons

Executive Secretariat: _____ cleared _____ Date: 02/28/2022
Lorna Middlebrough

Senior Resident Legal Officer (RLO): _____ e-cleared _____ Date: 2/28/2022
Betty Chung

Deputy Mission Director: _____ e-cleared _____ Date: 03/01/2022
Michael Nehrbass

APPROVAL:

Mission Director: _____ Date: 3/2/2022
Julie Koenen

CONCURRENCE:

Bureau Environmental Officer: _____ Date: _____
Asia Bureau William Gibson

Distribution: 1). Activity files, 2). Mission IEE Database, 3). OAA, 4). RLO

Attachment 1

**US Agency for International Development (USAID) / Pakistan
 Building Healthy Families Project
 Environmental Documentation Form (EDF)**

A. Applicant information

Contractor/grantee (organization)	Parent grant or project
Individual contact and title	Address, phone and email (if available)
Activity (brief description)	Amount
Location of activity	Start and end date of activity

B. Activities, screening results, and recommended determination

TABLE 1 Proposed Sub-activities	Screening result (Step 3 of instructions)			Recommended Determinations (Step 6 of instructions. Complete for all moderate and high-risk activities)		
	Very Low Risk	Moderate Risk	High Risk	No significant adverse impact	With specified mitigation, no significant adverse impact	Significant Adverse impact
1.						
2.						
3.						

C. Summary of recommended determinations (check all that apply)

The activity contains. . .	<i>(equivalent regulation 216 terminology)</i>
☐ Very low risk sub-activities	<i>categorical exclusion(s)</i>
☐ After environmental review, sub-activities determined to have no significant adverse impacts	<i>negative determination(s)</i>
☐ After environmental review, sub-activities determined to have no significant adverse impacts, given appropriate mitigation and monitoring	<i>negative determination(s) with conditions</i>
☐ After environmental review, sub-activities determined to have significant adverse impacts	<i>positive determination(s)</i>

D. Certification:

I, the undersigned, certify that:

1. The information on this form is correct and complete
2. The following actions have been and will be taken to assure that the activity complies with environmental requirements established for activities under the Code of Federal Regulations 22 CFR 216:

These design elements and best practices will be followed in implementing this activity, except with the approval of USAID.

Any specific mitigation or monitoring measures described in the attached information will be implemented in their entirety.

Compliance with these conditions will be regularly confirmed and documented by on-site inspections during the activity and at its completion.

COP (Signature)

(Date)

Environment Specialist (Signature)

(Date)

BELOW THIS LINE FOR USAID USE ONLY

Approval

USAID AOR		
☐ Approved		
☐ Rejected	(print name)	(signature)

USAID MEO/CIL		
☐ Approved		
☐ Rejected	(print name)	(signature)

USAID comments: (if documentation is rejected, comments must be provided to the applicant)

Attachment 2

**US Agency for International Development (USAID) / Pakistan
 Building Healthy Families Project
 Environmental Mitigation & Monitoring Plan (EMMP)**

- An EMMP should either be included in or developed for (1) **all IEEs** that have at least one “Negative Determination with Conditions” (or for activities for which an environmental review has been completed pursuant to an IEE requirement) and (2) all Environmental Assessments (EAs).
- If the EMMP is not developed as part of the IEE, the implementing partner should usually lead development of the EMMP, subject to review and oversight by the MEO/CIL OR Deputy MEO/CIL and AOR.
- In all cases, the tasks identified in the EMMP are incorporated into the implementing partner’s Work Plan, budget, and reporting.
- The following EMMP format is recommended. It can be adapted, as necessary.

Environmental Mitigation and Monitoring Plan:

Activity Title:

Implementing Partner:

Activity	Mitigation Measure(s)	Monitoring Indicator(s)	Monitoring and Reporting Frequency	Party(ies) Responsible	Indicative Budget
List all activities in IEE that received a “negative determination with conditions.” <i>Do not list any other activities in separate rows.</i>	If mitigation measures are well-specified in the IEE, quote directly from IEE If they are not well-specified in the IEE, define more specifically here.	Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)	For example: “monitor weekly, and report in quarterly reports. If XXX occurs, immediately inform USAID activity manager.”	If appropriate, <i>separately</i> specify the parties responsible for mitigation, for monitoring and for reporting.	For the monitoring and reporting of mitigation measures