

**INITIAL ENVIRONMENTAL EXAMINATION
AND
REQUEST FOR CATEGORICAL EXCLUSION**

PROGRAM/PROJECT DATA:

Project Name: Democracy, Human Rights, and Governance Project

Country/Region: Senegal/West Africa

Funding Begin: FY 2015

Funding End: FY 2021

LOP Amount: \$34,150.000 (including \$20 million DRG Integration funds from across sector office budgets)

IEE Expiration Date: December 31, 2021

IEE Prepared By: Abdourahmane Ndiaye, MEO

Current Date: September 8, 2015

IEE Amendment (Y/N): N If «yes», Number and date of original IEE:

ENVIRONMENTAL ACTION RECOMMENDED:

Categorical Exclusion: X Negative Determination: X

Positive Determination: Deferral:

ADDITIONAL ELEMENTS:

CONDITIONS: X ERF/EMMP (grants/sub-grants): X

SUMMARY OF FINDINGS:

Purpose and Scope of the IEE

The purpose of this IEE, in accordance with Title 22, Code of Federal Regulation, Part 216 (22CFR216), is to provide a preliminary review of the reasonably foreseeable effects on the environment, and on this basis, recommend Threshold Decisions, and in some cases attendant conditions for activities undertaken under the Democracy, Human Rights, and Governance (DRG) activities in Senegal. This IEE also sets out project-level implementation procedures intended to

assure that conditions in this IEE are translated into specific mitigation measures and actions and to ensure systematic compliance with this IEE during project implementation.

This IEE is a critical element of a mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation.

Recommended Environmental Threshold Determinations

Refer to Table 1 Section 3 for details.

Activity component	Recommended Threshold Determination			
	Categorical Exclusion	Negative Determination w/conditions	Positive Determination	Deferral
Project Purpose 1: Increased citizen engagement in governance processes	√	√		
Project Purpose 2: Strengthened effective local governance	√	√		
Project Purpose 3: Improved (national) government transparency and accountability	√			

MONITORING AND IMPLEMENTATION

In addition to the specific conditions enumerated in Section 3, the negative determinations recommended in this IEE are contingent on full implementation of a set of general monitoring and implementation requirements specified in Section 4 of the IEE.

These require, in summary: (1) IP Briefings on Environmental Compliance Responsibilities; (2) Development of environmental mitigation and monitoring plans (EMMPs); (3) Integration and implementation of EMMPs in workplans and budgets; (4) Integration of compliance responsibilities in prime and sub-contracts and grant agreements; (5) Assurance of sub-grantee and sub-contractor capacity and compliance; (6) Environmental compliance monitoring; (7) Compliance with host country requirements; and (8) Monitoring and Evaluation in areas with security concerns.

APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

Democracy, Rights and Governance (DRG) IEE

CLEARANCE:

Mission Director: Susan Fine Date: 10/1/2015
Susan Fine

CONCURRENCE:

Bureau Environmental Officer: Brian Hirsch Date: 10/30/15
Brian Hirsch

Approved: X

Disapproved:

File No: _____ (USAID/W BEO) Senegal DRG Portfolio IEE 103015

ADDITIONAL CLEARANCES

Mission Environmental Officer: Abdourahmane Ndiaye Date: 9/8/2015
Abdourahmane Ndiaye

Director of GDO: Michelle Barrett Date: 9/15/15
Michelle Barrett

GD Team Leader: Danny Dedeyan Date: 9/8/2015
Danny Dedeyan

Regional Environmental Officer: Kalim Hanna Date: 9/8/2015
Kalim Hanna

INITIAL ENVIRONMENTAL EXAMINATION

Program/Activity Number: 685-014

Country/Region: Senegal/West Africa

Program/Activity Title: Democracy, Human Rights, and Governance Project

1.0 BACKGROUND AND ACTIVITY/PROGRAM DESCRIPTION

1.1 Purpose and Scope of IEE

The purpose of this IEE, in accordance with 22CFR216, is to provide the first review of the reasonably foreseeable effects on the environment, and on this basis, recommend Threshold Decisions, and in some cases attendant conditions for activities undertaken under the Democracy, Human Rights, and Governance (DRG) project in Senegal. This IEE also sets out project-level implementation procedures intended to assure that conditions in this IEE are translated into specific mitigation measures and actions and to ensure systematic compliance with this IEE during project implementation.

1.2 Background

Project activities will directly contribute to Government of Senegal's (GOS) national economic and social development plan, *Plan Senegal Emergent* (PSE). More specifically, activities will work towards supporting the PSE's Third Axis: Governance, Institutions, Peace and Security with efforts contributing to the following key results: the efficacy of and correcting past inequities in public spending and infrastructure improvements. This includes a decentralization of economic development and political control from Dakar to other areas of the country. It also includes poverty reduction and youth employment through improving the business environment and attracting investment, as well as fostering a culture of transparency and accountability in the government with a focus on results.

Activities also will support implementation of Acte III, Phase II, of decentralization, which embraces more participatory, inclusive processes and increased engagement with civil society. Targeted project activities will focus on promoting peace and stability in the Casamance region.

Aligning with the principles of the Paris Declaration on Aid Effectiveness, the Accra Agenda for Action and USAID Forward, DRG's Project will promote collaboration and mutual accountability among USAID/Senegal, GOS, and other key partners. USAID/Senegal strives to work together closely with these organizations to promote well-coordinated development efforts, and leverage those efforts where possible through integrated delivery of donor services and support.

Key GOS decision-makers indicate that the government appears to be very committed to the goals of this project, especially the elements involving integration, collaboration, capacity building, and local development. The Project aligns with the GOS's current emphasis on

decentralization and deconcentration, shifting more decision-making power and responsibilities to regional and local government levels, with citizens playing important monitoring and feedback functions. When queried as to how USG assistance can have maximum impact in Senegal, responses from numerous GOS officials can be categorized into three areas: 1) Use Government-to-Government (G2G) mechanisms to assist with coordination, administration and capacity building needs; 2) Emphasize sustainability when designing programs and activities; and, 3) Support collaboration and communications for a well-coordinated overall approach to development. The Project is designed to sustain a strong, active partnership with GOS by supporting GOS decentralization, democratization, and reform efforts.

There currently exists an interagency working group for GOS, USAID, and other donors to come together and discuss development efforts. There is a general consensus among this group on the current strategic direction of enhanced collaboration, capacity building, and integration. Donor organizations that have programs in Senegal impacting DRG efforts include the European Union, Deutsche Kreditanstalt für Wiederaufbau and Gesellschaft für Internationale Zusammenarbeit (KfW/GIZ, Germany's development agencies), Agence Française de Développement (AFD - French Development Agency), United Nations Capital Development Fund (UNCDF), UNICEF, African Development Bank, World Bank, and the development agencies of Canada, Italy, Japan, Luxembourg, and Spain.

Thus, the Project will proactively engage in collaboration and coordination with GOS and its other donor partners, capitalizing on integration and synergy opportunities that already exist among GOS and its donors. This is already occurring to some degree, a contemporary example being a GOS-donor joint effort to establish good governance standards, measures, and capacity building tools. Synergy across stakeholders was an important concept in Senegal's development environment and has been cited frequently by numerous GOS and donor stakeholders. To this end, the opportunity presents itself for the USAID DRG project to play a prominent role in fostering synergy in good governance activities.

1.3 Description of Activities

Illustrative Activities: Sub-IR 2.1- Increased citizen engagement in governance processes

- Develop a unified, Mission-wide mechanism for capacity development of both civil society and government entities that incorporates and strengthens local consultants, firms, and service providers whenever possible.
- Bring CSOs (DRG/advocacy and service delivery), the GOS, and other non-state actors together on a proactive basis (conferences, meetings, workshops, etc.) to address key issues, develop solutions, coordinate activities and ensure follow-up.
- Increase the capacity of civil society to engage in strategic planning, budget analysis and social accountability methodologies, and strengthen their capacity to advocate for greater budget transparency and targeted resource allocations.
- Develop the capacity, skills, and awareness of all civil society groups on gender and social analysis and encourage them to draw attention to these issues.
- Support organizations that represent youth and women so they can act as key players in the design, leadership, and implementation of the above activities.
- Enhance the quality of citizen input and engagement through various citizen educational, political and informational activities.
- Engage in peer-to-peer support efforts where communities with high citizen participation capacity can work with and assist communities with low capacity.
- Identify African-based citizen participation models and best practices, and use those appropriate for Senegal to build local capacity in this regard.
- Work with GOS and donors to establish commonly used and accepted citizen participation capacity building tools and measurement standards.
- Promote new technology and communications mechanisms for enhancing citizen participation (internet access, social media, community radio, user-friendly publications, etc.).
- Undertake citizen awareness campaigns in key community need areas.
- Work closely with other sector offices to ensure that a lack of basic services is not inhibiting individuals' ability and capacity to participate in citizen engagement.

Illustrative Activities: Sub-IR 2.2- Strengthened effective local governance

- Assess local governance, the capacity-building needs of Collectivités Locales (CL) and possibly service delivery points (health centers/posts/huts, schools, WASH associations, service delivery organizations, private service delivery entities) through the use of Good Governance Barometer (BBG).
- Strengthen or establish forums where local government entities interact with citizens (with a focus on inclusion of women and youth), civil society, and service delivery points. These may include parent-teacher associations, professional associations, producer organizations, WASH committees, traditional leaders, youth and women groups.
- Deliver targeted capacity building (as designed by a Mission Integration Team) to support local governance strengthening and service delivery activities in targeted areas.
- Train and provide technical assistance to DRG integration stakeholders (GOS technical staff, local governments, relevant sector staff, implementing partners, etc.).
- Support peace building, reconciliation, and local development (economic, political, and social) efforts through the “People to People” approach in the Casamance.
- Build the capacity of Communes to mobilize resources and invest in service delivery through local revenue raising (taxation) and innovative funding.
- Engage local stakeholders in the budget process (needs assessment, “débat orientation budgétaire,” resource allocation, particularly to health, WASH, and education sectors).
- Assist in the development accountability mechanisms and processes between CLs and service delivery points in the target sectors of health, WASH, education.
- Assist local structures, such as parent-teacher associations, school management committees, community health structures, and environmental groups to increase engagement with government officials to improve learning, health, and WASH outcomes.
- Strengthen synergies and coordination of advocacy messages between sectoral and/or geographical organizations to ensure that organizations from various sectors mutualize expertise and resources (when feasible) to more effectively advocate on policy and service delivery.
- Develop communication campaigns in local areas related to service delivery issues, such as education, health, and WASH, to deepen understanding of local government priorities and processes.

Illustrative Activities: Sub-IR 2.3- Improved government transparency and accountability

- Support CSOs, political parties, and government institutions such as the National Assembly, Ministry of the Interior, President’s Office and others to work collaboratively and to achieve consensus on policy reform and citizen needs.
- Mobilize citizens to participate in decision-making processes at the national level.
- Support implementation of the action agenda “parliamentary oversight and citizen engagement in the service of women” developed by female and youth parliamentarians.
- Provide technical capacity development to Members of Parliament (MPs) and executive branch personnel, with customized capacity building offered to female MPs designed to help them maximize their role, impact and influence within the government.
- Provide targeted training technical assistance to government entities as well as political parties on aspects of democracy, leadership, responsible governance, transparency, accountability and confidence building measures.
- Provide technical assistance to good governance and electoral oversight institutions.
- Harness and leverage efforts to track progress on government commitments such as campaign promises, Senegal’s national development plan, institutional reform commission, and others.
- Develop a platform of dialogue between GOS ministries and Agencies and Civil Society organizations on fiscal transparency issues, budget tracking and monitoring, and public accountability.
- Utilize a peer-to-peer model among national level stakeholders (GOS leadership, technical staff, MPs, etc.), connecting those experienced in accountability and transparency models and best-practices with those needing assistance in understanding and mastering those concepts.
- Work with the National Anti-Corruption Office to increase efforts to reduce corruption and fraud.

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

2.1 Locations Affected

Senegal is located on the west of the African continent. It lies between latitudes 12° and 17°N, and longitudes 11° and 18°W. The country’s total area is 196 190 km² of which 192,000 km² is land and 4,190 km² is water. Senegal is bordered to the west by the North Atlantic Ocean. On

land, the nation's longest border is with Mauritania to the north, an 813 km border along the Senegal River. To the east is the 419 km border with Dakar. In the southeast is Guinea (330 km border) and to the south-southwest is Guinea-Bissau (338 km), both borders running along the Casamance River. Senegal is one of only a handful of countries to have a near-enclave within its borders—the small nation of the Gambia in the interior, which has a 740 km border with Senegal.

In total, Senegal has 2,640 km of land borders, and 531 km of coastline and shoreline. The lowest point in Senegal is the Atlantic Ocean, at sea level. The highest point is an unnamed feature near Nepen Diakha in the Fouta Djallon foothills at 581 m (1,906 ft).

Climate

Senegal's climate is conditioned by the tropical latitude of the country and by the seasonal migration of the Intertropical Convergence Zone (ITCZ)—the line, or front, of low pressure at which hot, dry continental air meets moist oceanic air and produces heavy rainfall. The prevailing winds are also characterized by their origin: the dry winds that originate in the continental interior and the moist maritime winds that bring the rains. From the combination of these factors, three principal climate zones may be distinguished: coastal, Sahelian, and Sudanic.

- **The coastal region:** the Atlantic coastal strip is cooler than inland, partly due to brisk onshore winds. Winter temperatures range from 18-26°C in January. In summer; maximum temperatures average around 31°C. Rains arrive in July, peak in August and tail off by October, bringing around 550mm of rainfall annually.
- **The Sahel region:** the northern half of the country falls within the 'Sahel belt', a region of semi-arid land which spans across the African continent. Here, temperatures can be cool at night (dropping to around 14°C), but often reach 40°C by day. Rainfall is below 400mm.
- **The Southern region (in Casamance/Zinguinchor):** the southern half of the country is hot and humid, with average maximum temperatures above 30°C throughout the year. Rainfall is usually over 1,500mm to the far south from June to October.

Topography

The topography of Senegal is generally quite flat (elevations below 50 m on nearly 75% of the territory). The highest altitudes (highest point 581 m) are found in the far south-east of the foothills of the Fouta.

Soils

The soils of Senegal range from dry sandy soils in the north, to tropical ferruginous soils in the central region, and to ferralitic soils in the South. Overall, soil fertility is low and soils are mostly fragile, making them highly susceptible to water and wind erosion (USGS/EROS, op. cit.). The soil texture of most fresh water river valleys tends to be high in clay and silt content. Soils in these valleys are classified as "generally good soils", i.e., they do not have serious limitations and are able to produce good yields of suitable, climatically adapted crops. Most cultivated soils located in the Peanut Basin are "generally poor to moderate soils". These soils have one or more limitations that restrict their use, are usually of fairly low natural fertility, and generally give low to moderate yields of climatically adapted crops under traditional systems of management.

Hydrology

There are 4 major river systems in Senegal. The country is drained by the Sénégal, Saloum, Gambia (Gambie), and Casamance rivers, all of which are subjected to a monsoonal climatic regime—i.e., a dry season and a rainy season.

Vegetation

The vegetation of Senegal can be divided into three major ecological regions. From north to south, they are: the Sahelian Region, the Sudanian Region, and the Guinean Region.

Vegetation found in the Sahelian zone are shrubby steppe (sandy part of the Ferlo) and shrubby savannah (lateritic part of the Ferlo).

The Sudanian zone, located at the central and western part of the country, covers nearly 40% of the national territory. Rainfall exceeds 600 mm/year and can last 4 months or more. Natural forests are therefore more diversified and productive. Plant cover is currently characterized by a mosaic composed of shrub lands, wooded savannahs, woodlands and a few remnants of open forests.

The Guinean zone is confined to the southern part of the Tambacounda region and the regions of Ziguinchor and Kolda, where the annual rainfall is above 1000 mm. Vegetation is similar to the Guinean zone, and it is comprised of small relics of massive dry forests on sandy plateaus growing with deep soils and gallery forests found all along the rivers.

Demography

As of July 2014, the population of Senegal is estimated to be 13.9 million inhabitants, growing at a rate of 2.7% a year and is expected to keep growing, that is higher than the world average (1.14%), but is comparable to other countries in the region (2.5%).

About 70% of Senegal's population is rural. In rural areas, density varies from about 77 inhabitants per km² (or 200 inhabitants/mile²) in the west-central region to 2 inhabitants per km² (5 inhabitants/mile²) in the arid eastern section. About 50,000 Europeans (mostly French), Lebanese, and Vietnamese reside in Senegal, mainly in the cities.

Life expectancy figures for Senegal, averaging about 56 years for both men and women, are among the highest in sub-Saharan Africa. The population is heavily weighted toward the young, as are most African populations, with more than two-fifths under 15 years of age. Urban unemployment and underemployment remain high.

Gender analysis

Women in Senegal lack the knowledge and opportunities necessary to successfully occupy decision-making roles in their communities. Senegal is making slow but steady progress towards enacting national policies endorsing gender equity in national and local governing bodies. The implementation of the gender parity law in the recent legislative and local elections ushered in a record number of women in elected government bodies. Women now make up about 50 percent in those institutions yet many have limited education and hold a small percentage of leadership positions. Most striking is the absence of strong female voices in public dialogue. Women experience a lack of knowledge and training in various economic, social, cultural, and political areas. Women are not well versed on fundamental human and civil rights, have few

opportunities for professional training, and lack access to health care, education, and capital. These all serve as obstacles to women's ability to advocate for themselves and their interests.

Climate Change

Climate change in Senegal is predicted to manifest as a decrease in the amount of rainfall—however with increased intensity, increased temperatures, and sea-level rise. Drought and saline intrusion threaten water supplies, while sea-level rise along with coastal erosion threaten infrastructure. Meanwhile, urban-coastal migration and degraded natural resources are already aggravating development challenges.

Climate change activities are coordinated by the National Climate Change Committee and 10 Regional Climate Change Committees across the country. Communes have critical roles in adaptation to climate change as well as in mitigation (reducing greenhouse gas emissions) and adaptation (strategy to reduce impacts of floods in their communes). They also have most of the urban population at greatest risk from the increased intensity and/or frequency of storms, flooding, and heat waves that climate change is bringing or will bring. It can be argued that they have the central role in adaptation within their jurisdictions – although it is obvious that they need a supportive institutional, regulatory and financial framework from higher levels of government and, for most low- and middle-income nations, also from international agencies.

The project should integrate climate change dimensions in strengthening local governance through the messages sent to local councilors and the National Assembly.

2.2 Applicable Host Country Environmental and Social Laws, Regulations and Policies

The Environmental Code (Law No. 2001-01 of 15 January 2001, Decree No. 2001-282 of 12 April 2001) is the legal principal environmental regulation in Senegal.

Internationally, Senegal has ratified and adopted decisions that have emerged from various conferences on the environment, particularly those of Rio and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their environmentally sound disposal.

With USAID funding, a National Environment Action Plan (NEAP) was completed in 1997 that lays the framework for cooperation among all ministries for environmental policy and dialogue. This resulted in the new Environment Code that was established in 2001. The NEAP was also followed by the National Plan to Fight Against Desertification to develop specific actions to combat desertification. A *Biodiversity Strategy* was adopted that lays out priority areas for biodiversity conservation. The Decentralization Code of 1996 has had considerable impact on how the environment is managed as it transferred jurisdiction for natural resource management to local governments. Other pertinent environmental policies are:

- The national strategy for implementation of the United Nations Framework on the Climate Change Convention.
- The national action plan for the management of hazardous waste.

For the electronic and IT equipment wastes that we expect to have in this project, Senegal has no specific legislation for the management of electronic waste or used computer equipment. However, the management of such waste could be considered by the Environment Code which defines “wastes” as any solid, liquid, gaseous, or residue of a process production, processing, or using any other substances removed to be eliminated or to be eliminated under the laws and regulations.

3.0 EVALUATION OF PROJECT ACTIVITIES (INCLUDING SMALL GRANTS) WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL AND RECOMMENDED THRESHOLD DECISIONS

The different activities of the project, their potential negative impacts and the recommended environmental determinations are as follows:

Table 1:

Evaluation of project activities with respect to environmental impact and recommended determinations.

Proposed Activities	Potential Adverse Impacts	Recommended Determinations
Project Purpose 1: Increased citizen engagement in governance processes		
Develop a unified, Mission-wide mechanism for capacity development of both civil society and government entities that incorporates and strengthens local consultants, firms, and service providers whenever possible.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output will consist of technical assistance for government institutions to improve business processes.
Bring CSOs (DRG/advocacy and service delivery), the GOS, and other non-state actors together on a proactive basis (conferences, meetings, workshops, etc.) to key issues, develop solutions, coordinate activities and ensure follow-up.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output will consist of technical assistance for government institutions to improve business processes.
Increase the capacity of civil society to engage in strategic planning, budget analysis and social accountability methodologies, and strengthen their capacity to advocate for greater budget transparency and targeted resource allocations.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output will consist of technical assistance for government institutions to improve business processes.
Develop the capacity, skills and awareness of all civil society groups on gender and social analysis and encourage them to draw attention to these issues Support organizations that represent youth and women so they can act as key players in the design, leadership and	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output will consist of training, technical assistance and capacity building.

implementation of the above activities.		
Enhance the quality of citizen input and engagement through various citizen educational, political and informational activities.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Engage in peer-to-peer support efforts where communities with high citizen participation capacity can work with and assist communities with low capacity.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Identify African-based citizen participation models and best practices, and use those appropriate for Senegal to build local capacity in this regard.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Work with GOS and donors to establish commonly used and accepted citizen participation capacity building tools and measurement standards.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Promote new technology and communications mechanisms for enhancing citizen participation (internet access, social media, community radio, user-friendly publications, etc.).	These activities will include the acquisition of materials and IT equipment. If used materials are abandoned or dumped in an into the environment, metals and other toxins will gradually contaminate soil and groundwater reserves.	<p>A Negative determination pursuant to 22 CFR 216.3 (a)(2)(iii) subject to the following condition :</p> <p>The management of user computer equipment and other technology material must follow appropriate standards to prevent the proliferation of heavy metals in the environment.</p> <p>To ensure proper management of used computers and electronic equipment contact the company (SENECLIC) to ensure proper recycling.</p>
Undertake citizen awareness campaigns in key community need areas in collaboration with (connected to integration activities in Sub IR 2.2 below).	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.

Work closely with other sector offices to ensure that lack of basic services is not inhibiting individuals' ability and/or capacity to participate in citizen engagement.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Project Purpose 2: Strengthened effective local governance		
Assess local governance, the capacity-building needs of CLs and possibly service delivery points (health centers/posts/huts, schools, WASH associations, service delivery organizations, private service delivery entities) through the use of Local Governance barometer (BBG).	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Strengthen/establish forums where local government entities interact with citizens (with a focus on inclusion of women and youth), civil society, and service delivery points. These may include parent-teacher associations, professional associations, producer organizations, WASH committees, traditional leaders, youth and women groups.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Create an Integration Team charged with planning and implementing DRG activities across sectors, and in coordination with GOS and donor organizations (see further integration discussion below).	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Develop an A&A instrument that all sector teams can use to build the capacity of government	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs

entities in key areas such as decentralization, supporting local development, leadership, organizational and financial management, participatory planning and budgeting, service delivery performance, and citizen engagement.		
Deliver targeted capacity building (as designed by the above Integration Team) to support local governance strengthening and service delivery activities in targeted areas.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Provide integrated related training and technical assistance to DRG integration stakeholders (GOS technical staff, local governments, relevant sector staff, implementing partners, etc.).	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Support peace building, reconciliation and local development (economic, political and social) efforts through the “People to People” approach in the Casamance.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Build the capacity of Communes to mobilize resources and invest in service delivery through local revenue raising (taxation) and innovative funding.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output will consist of technical assistance to communes.
Engage local stakeholders in the budget process (needs assessment, “débat orientation budgétaire,” resource allocation, particularly to health, WASH and education sectors).	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output will consist of technical assistance to communes.

Assist in the development accountability mechanisms and processes between CLs and service delivery points (health, WASH, education).	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output will consist of training and technical assistance.
Assist local structures, such as parent-teacher associations, school management committees, community health structures, and/or environmental groups to increase engagement with government officials to improve learning, health, and WASH outcomes.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output will consist of training and technical assistance.
Forge public-private alliances and leverage USG resources.	This activity will be about DCA/ GDAs and sub-grantees.	<p>A Negative determination pursuant to 22 CFR 216.3 (a)(2)(iii) subject to the following condition: Subject to Reg. 216 no USAID-funded GDA/DCA activity can be implemented without approved Reg. 216 documentation. As we do not have enough information about the design of the alliance and its activities to be able to make an informed decision in the IEE regarding environmental impacts and mitigation measures that may be required, a separate IEE should be prepared covering the GDA/DCA activities.</p> <p>For grants and sub-grantees: Grant proposals will be evaluated using the Environmental Review Form (ERF). An ERF and EMMP will be completed by the implementing partner and approved by the A/COR before any commitment of resources to the interventions in question.</p>
Strengthen synergies and coordination of advocacy messages between sectoral and/or geographical organizations to ensure that organizations from various sectors mutualize expertise and resources (when feasible) to more effectively advocate on policy and service delivery.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Develop communication	These activities are not anticipated to	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an

campaigns (including media content) in local areas related to service delivery issues, such as education, health, and WASH, to deepen understanding of local government priorities and processes.	have any adverse impacts on the physical and biological environment.	effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Project Purpose 3: Improved (national) government transparency and accountability		
Support CSOs, political parties, and government institutions such as the National Assembly, Ministry of the Interior, President's Office and others to work collaboratively, achieve consensus on policy reform and citizen needs.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs. This output will consist of technical assistance for government institutions.
Mobilize citizens to participate in decision-making processes at the national level.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Support implementation of the action agenda "parliamentary oversight and citizen engagement in the service of women" developed by female and youth parliamentarians.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Provide technical capacity development to Members of Parliament (MPs) and executive branch personnel, with customized capacity building offered to female MPs designed to help them maximize their role, impact and influence within the government.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Provide targeted training technical assistance to government entities as well as	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.

political parties on aspects of democracy, leadership, responsible governance, transparency, accountability and confidence building measures.		
Provide technical assistance to good governance and electoral oversight agencies or offices.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Harness and leverage efforts to track progress on government commitments such as campaign promises, Senegal's national development plan, institutional reform commission and others.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Develop a platform of dialogue between GOS ministries and Agencies and Civil Society organizations on fiscal transparency issues, budget tracking and monitoring, and public accountability.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Utilize a peer-to-peer model among national level stakeholders (GOS leadership, technical staff, MPs, etc), connecting those experienced in accountability and transparency models and best-practices with those needing assistance in understanding and mastering those concepts.	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.
Work with the National Anti-Corruption Office to increase efforts to reduce corruption and fraud	These activities are not anticipated to have any adverse impacts on the physical and biological environment.	Categorical Exclusion pursuant to 22CFR 216.2(c)(1)(i) for action not having an effect on the environment and 22CFR 216.2(c)(2)(i) for education, technical assistance or training programs.

Small Grants Activities

This DRG project will take advantage of small grants programs as a tool to expand their impact. Grant proposals will be evaluated using the Environmental Review Form (ERF). An ERF and EMMP will be completed by the implementing partner and approved by the A/COR before any commitment of resources to the interventions in question. Any mitigation measures or design conditions specified by the approved ERF must be implemented by the partner/grantee; these measures and conditions will be informed by and substantially conform to best practices outlined in the USAID's Sector Environmental Guidelines. The guidelines are available at <http://usaidgems.org/sectorGuidelines.htm>. The DRG team will assure that the MEO regularly receives information on environmental compliance through quarterly reports, EMMPs, ERFs, and monitoring trips to the field.

4.0 RESTRICTION, IMPLEMENTATION, AND MONITORING REQUIREMENTS

4.1 GENERAL RESTRICTIONS: PESTICIDES

This IEE does NOT authorize support for pesticides, including their procurement, use, transport, storage or disposal. Any pesticide activity proposed under this program would necessitate an amended IEE, including all elements of analysis required by 22CFR216.3 (b) under USAID Pesticide Procedures.

4.2 GENERAL PROJECT IMPLEMENTATION AND MONITORING REQUIREMENTS

In addition to the specific conditions enumerated in the table above, the negative determination with conditions recommended in this IEE are contingent upon full implementation of the following general monitoring and implementation requirements.

Consideration of Project-level IEEs. This DRG portfolio IEE was developed, as required by USAID project design guidance, during the pre-PAD analysis stage in the project design cycle. As such, it was developed with only relatively general information available regarding proposed activities.

Therefore, for each major DRG procurement (Ex: DCA and other Public-Private Alliances), the DRG team, in consultation with the MEO and REA, must consider whether the goal of environmentally sound design and management and clarity and transparency regarding IP and DRG team compliance requirements would be best served by development of a project-level IEE based on far more specific activity descriptions.

Such project-level IEEs would supersede this portfolio IEE for a particular procurement, but would be guided by and establish conditions no less stringent than those set out by this IEE. Such IEEs must incorporate all of the remaining conditions set out in this section.

In addition:

1. The DRG team shall provide each DRG Implementing Partner (hereinafter IP), with a copy of this IEE; Each IP shall be briefed on their environmental compliance responsibilities by their cognizant C/AOR. During this briefing, the IEE conditions applicable to the IP's activities will be identified.
2. Development of EMMP. Each IP whose activities are subject to one or more conditions set out in Section 3 of this IEE shall develop and provide for C/AOR review and approval an Environmental Mitigation and Monitoring Plan (EMMP)

documenting how their project will implement and verify all IEE conditions that apply to their activities.

These EMMPs shall identify how the IP shall assure that IEE conditions that apply to activities supported under subcontracts and subgrants are implemented. (In the case of large subgrants or subcontracts, the IP may elect to require the subgrantee/subcontractor to develop their own EMMP.)

(Note: The AFR EMMP Factsheet provides EMMP guidance and sample EMMP formats:

http://www.usaidgems.org/Documents/lopDocs/ENCAP_EMMP_Factsheet_22Jul2011.pdf)

3. Integration and implementation of EMMP. Each IP shall integrate their EMMP into their project work plan and budgets, implement the EMMP, and report on its implementation as an element of regular project performance reporting. IPs shall assure that subcontractors and subgrantees integrate implementation of IEE conditions, where applicable, into their own project work plans and budgets and report on their implementation as an element of sub-contract or grant performance reporting.
4. The cognizant USAID team will also ensure that provisions of the IEE concerning mitigative measures and the conditions specified herein along with the requirement to monitor be incorporated in all implementation instruments and sub-agreements issued under these instruments. IPs shall assure that sub-contracts and sub-grant agreements reference, and require compliance with, relevant elements of these conditions.

Any grants or fund transfers from organizations receiving USAID funds to other organizations must incorporate provisions that the activities to be undertaken will be within the scope of the environmental determinations and recommendations of this IEE. If any ongoing activities fall outside the scope of the approved Regulation 216 environmental documentation, the activities shall be halted until an amendment to the documentation is submitted and written approval is received from USAID.

5. Assurance of sub-grantee and sub-contractor capacity and compliance. IPs shall assure that sub-grantees and subcontractors have the capability to implement the relevant requirements of this IEE. The IP shall, as and if appropriate, provide training to subgrantees and subcontractors in their environmental compliance responsibilities and in environmentally sound design and management (ESDM) of their activities. As required by ADS 204.5.4, the Mission DRG team must actively monitor activities for compliance with approved IEE conditions for implementation, and modify or end activities that are not in compliance.
6. If USAID or the Implementing Partners plan any new activities or substantial modifications to existing activities outside the scope of the approved Regulation 216 environmental documentation, an amendment shall be prepared to the documentation for USAID review and approval. No such new activities shall be undertaken prior to receiving written USAID approval of environmental documentation amendments. The conditions in this section shall be incorporated into the contract language for each mechanism working under the Peace and Democratic Governance project. The management team should consult the paper “Environmental Compliance: Language for use in solicitations and awards” for guidance.

7. Nothing in this IEE substitutes for or supersedes IP, subgrantee and subcontractor responsibility for compliance with all applicable host country laws and regulations. The IP, subgrantees and subcontractor must comply with host country environmental regulations unless otherwise directed in writing by USAID. However, in case of conflict between host country and USAID regulations, the latter shall govern.
8. If activities are carried out in areas of the country that USAID staff cannot visit because of security concerns, every effort will be made to provide acceptable monitoring and evaluation for environmental compliance. An appropriate plan for monitoring and evaluation will be agreed upon by the A/COR and the Mission Environmental Officer before implementation of activities in insecure areas or within a reasonable amount of time in areas where activities are already being implemented.

ANNEX 1:

Environmental Screening Form for Democracy, Human Rights, and Governance Project - subprojects/subgrants

A. Applicant information

Organization	Parent grant or project
Individual contact and title	Address, phone & email (if available)
Proposed subproject /subgrant (brief description)	Amount of funding requested
	Period of performance
	Location(s) of proposed activities

B. Activities, screening results, and findings

Proposed activities (Provide DESCRIPTIVE listing. Continue on additional page if necessary)	Screening result (Step 3 of instructions)			Findings (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities ONLY)		
	Very Low Risk	High-Risk*	Moderate or unknown risk*	significant adverse impacts are very unlikely	With specified mitigation, significant adverse impacts are very unlikely	Significant Adverse impacts are possible
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						

*These screening results require completion of an Environmental Review Report

C. Certification:

I, the undersigned, certify that:

1. The information on this form and accompanying environmental review report (if any) is correct and complete.
2. Implementation of these activities will not go forward until specific approval is received from the C/AOTR.
3. All mitigation and monitoring measures specified in the Environmental Review Report will be implemented in their entirety, and that staff charged with this implementation will have the authority, capacity and knowledge for successful implementation.

(Signature) _____ (Date) _____

(Print name) _____ (Title) _____

Note: if screening results for *any activity* are “high risk” or “moderate or unknown risk,” this form is not complete unless accompanied by an environmental review report.

BELOW THIS LINE FOR USAID USE ONLY

Notes:

1. For clearance to be granted, the activity MUST be within the scope of the activities for which use of the ERF is authorized in the governing IEE. **Review IEE before signature.** If activities are outside this scope, deny clearance and provide explanation in comments section. The Partner, C/AOTR, MEO and REA must then confer regarding next steps: activity re-design, an IEE or EA.
2. Clearing an ERF containing one or more findings that **significant adverse impacts are possible** indicates agreement with the analysis and findings. It does NOT authorize activities for which “significant adverse impacts are possible” to go forward. It DOES authorize other activities to go forward. The Partner, C/AOTR, MEO and REA must then confer regarding next steps: activity re-design, an IEE or EA.

Clearance record

C/AOTR ☐ Clearance given ☐ Clearance denied	(print name)	(signature)	(date)
USAID/Senegal MEO ☐ Clearance given ☐ Clearance denied	(print name)	(signature)	(date)
Regional Env. Advisor (REA) ☐ Clearance given ☐ Clearance denied	(print name)	(signature)	(date)
Bureau Env. Officer (BEO)* ☐ Clearance given ☐ Clearance denied	(print name)	(signature)	(date)

C/AOTR, MEO and REA clearance is required. BEO clearance is required for all “high risk” screening results and for findings of “significant adverse impacts possible. The BEO may review ”

Note: if clearance is denied, comments must be provided to applicant
(use space below & attach sheets if necessary)



Supplement to the Environmental Review Form for Natural Resources Activities

Additional Screening Criteria for Democracy, Human Rights, and Governance Project –Senegal

Purpose

This is a supplement to the “Instructions for environmental review of Democracy, Human Rights, and Governance Project activities.” It is to be used for natural *resources-based activities*, including:

- Community-Based Natural Resource Management (CBNRM)
- Ecotourism
- Natural resources-based enterprise development with micro- and small enterprises

This supplement provides additional questions to ascertain whether these proposed activities should be categorized as “very low risk:”

- If the answers to ALL the questions that follow are “NO,” then the proposed natural resource-based activity is considered “very low risk.”
- If the answer to ANY question is “YES,” the activity CANNOT be considered “very low risk.”

Screening criteria

Will the activities...	YES	NO
Natural Resources		
Accelerate erosion by water or wind?		
Reduce soil fertility and/or permeability?		
Alter existing stream flow, reduce seasonal availability of water resources?		
Potentially contaminate surface water and groundwater supplies?		
Involve the extraction of renewable natural resources?		
Lead to unsustainable use of renewable natural resources such as forest products?		
Involve the extraction of non-renewable natural resources?		
Restrict customary access to natural resources?		
Reduce local air quality through generating dust, burning of wastes or using fossil fuels and other materials in improperly ventilated areas?		
Affect dry-season grazing areas and/or lead to restricted access to a common resource?		
Lead to unsustainable or unnecessarily high water extraction and/or wasteful use?		
Ecosystems and Biodiversity		
Drain wetlands, or be sited on floodplains?		
Harvest wetland plant materials or utilize sediments of bodies of water?		
Lead to the clearing of forestlands for agriculture, the over-harvesting of valuable forest species?		
Promote in-forest bee keeping?		
Lead to increased hunting, or the collection of animals or plant materials?		
Increase the risks to endangered or threatened species?		
Introduce new exotic species of plants or animals to the area?		

Will the activities...	YES	NO
Lead to road construction or rehabilitation, or otherwise facilitate access to fragile areas (natural woodlands, wetlands, erosion-prone areas)?		
Cause disruption of wildlife migratory routes?		
Agricultural and Forestry Production		
Have an impact on existing or traditional agricultural production systems by reducing seed availability or reallocating land for other purposes?		
Lead to forest plantation harvesting without replanting, the burning of pastureland, or a reduction in fallow periods?		
Affect existing food storage capacities by reducing food inventories or encouraging the incidence of pests?		
Affect domestic livestock by reducing grazing areas, or creating conditions where livestock disease problems could be exacerbated?		
Involve the use of insecticides, herbicides and/or other pesticides?		
Community and Social Issues		
Have a negative impact on potable water supplies?		
Encourage domestic animal migration through natural areas?		
Change the existing land tenure system?		
Have a negative impact on culturally important sites in the community?		
Increase in-migration to the area?		
Create conditions that lead to a reduction in community health standards?		
Lead to the generation of non-biodegradable waste?		
Involve the relocation of the local community?		
Potentially cause or aggravate land-use conflicts?		