# INITIAL ENVIRONMENTAL EXAMINATION

## ACTIVITY DATA

| | |
|---|---|
| Activity Name: | BHA Fiscal Year (FY) 2022 Title II: Request for Applications (RFA) for International Food Relief Partnership (IFRP): Shelf-Stable Food Commodity Transportation, Delivery, and Distribution |
| Amendment (Y/N): | N |
| Geographic Location(s) (Country/Region): | Various[1] |
| Implementation Start/End: | FY 2022 - 2024 |
| Solicitation/Contract/Award Number: | Various, TBD |
| Implementing Partner(s): | Various, TBD |
| Link to IEE: | https://ecd.usaid.gov/document.php?doc_id=54982 |

## ORGANIZATIONAL/ADMINISTRATIVE DATA

| | |
|---|---|
| Implementing Operating Unit(s):<br>(e.g. Mission or Bureau or Office) | Bureau for Humanitarian Assistance (BHA) |
| Funding Operating Unit(s): | Same as above |
| Funding Account(s): | BHA, Title II |
| Funding Amount: | $200,000 maximum/per application for one commodity<br>$225,000 maximum/per application for two proposed commodities[2] |
| Amendment Funding Date: | Amendment Funding Amount: |
| Other Affected Unit(s): | Regional Bureaus and Missions |
| Lead BEO Bureau: | BHA |
| Prepared by: | Environmental Compliance Support (ECOS) contract |
| Date Prepared: | February 15, 2022 |

## ENVIRONMENTAL COMPLIANCE REVIEW DATA

| | |
|---|---|
| Analysis Type: | Initial Environmental Examination |
| Environmental Determination(s): | Categorical Exclusion, Negative Determination |
| IEE Expiration Date: | End of FY 2024 |
| Additional Analyses/Reporting Required: | N/A |
| Climate Risks Rating for Risks Identified: | Low: X Moderate: X High: |

[1] IFRP activities are typically awarded in 12-14 countries per year. Previous awards have included Haiti, Niger, Cameroon, and Somaliland.

[2] The original funding amount was $175,000/per one commodity, and $200,000 for two commodities, but was revised to the current funding amount on May 10, 2022 to account for global fuel/shipping/transport costs.

# THRESHOLD DECISION MEMO AND SUMMARY OF FINDINGS

## PURPOSE AND SCOPE OF THE INITIAL ENVIRONMENTAL EXAMINATION

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

The IFRP is a USAID Bureau for Humanitarian Assistance (BHA) program that supports the transportation, delivery, and distribution of shelf-stable, prepackaged foods by U.S. non-profit and Public International Organizations (PIOs). Grant awards ($225,000.00 maximum per grant) under the IFRP program are subject to all applicable requirements of USAID, including 22 CFR 216 and ADS 201.

## ACTIVITY SUMMARY

As specified in the FY22 Request for Applications (RFA), IFRP activities aim to enhance the food security of vulnerable populations across the globe – including at-risk infants and young children, orphans, pregnant and/or lactating women, the elderly, and other similar groups – through direct food distribution programs primarily in institutional settings such as health clinics, schools and community centers. All IFRP grantees will be involved with commodity distribution and management activities (described below) as the primary purpose of IFRP.

Most IFRP grantees also support other ongoing programs with complementary activities that are NOT funded by USAID. Programs may include healthcare services; small-scale construction; gardening, demonstration plots, or the like. These complementary activities are outside of USAID's direct control, and therefore, environmental and climate safeguard measures are managed by the governing organization.

## ENVIRONMENTAL DETERMINATIONS AND CLIMATE RISK RATINGS

A **Categorical Exclusion** is recommended for training, research and capacity building activities that are not expected to have a direct impact on the environment and PIO activities. These activities receive a **low** climate risk rating.

A **Negative Determination with Conditions** is recommended for commodity management and distribution activities. These activities receive a **moderate** climate risk rating.

Upon approval of this document, the determinations become affirmed, per Agency regulations (22 CFR 216).

## BEO SPECIFIED CONDITIONS OF APPROVAL

The AOR will ensure the following:

**Condition 1: Packaging Waste Management.** In accordance with the RFA (Section IV, B. Technical Narrative, Implementation Plan), all IFRP Grantees must include a commodity-specific, waste management plan with their application that describes how the project will manage product-related solid waste packaging, in particular individual product wrapping/containers/boxes/bags/sachets related to commodity management activities. For each separate packaging product material, IFRP awardees should incorporate reuse or recycling measures, where applicable. Reuse and recycling should be prioritized over incineration of packaging products, and sufficient budget should be allocated for implementation of the waste management plan.

**Condition 2. Efficient Energy Use.** In accordance with the requirements of the RFA (Section IV, B. Technical Narrative, Implementation Plan), all IFRP Grantees must incorporate energy use efficiency into the planning and preparation of IFRP commodities.

**Condition 3: Environmental Budgeting.** Sufficient budget will be allocated for implementation of environment and climate safeguarding measures, including implementation of the waste management plan and planning for energy use efficiency.

**Condition 4: Oversight and Reporting.** As required by ADS 204.5.4, the AOR, in consultation with IFRP grantees, MEO, BEO and CIL, will monitor and evaluate whether environmental consequences unforeseen under activities covered by this RFA IEE arise during implementation.

**Condition 5: Environmental Governance.** Implementation will in all cases adhere to applicable host country environmental laws.

**Condition 6: Public International Organizations (PIOs).** Where IFRP grantees work with PIOs on supplementary activities (such as healthcare provision, small-scale construction, or demonstration plots/gardening) that are not funded by USAID, PIOs must follow their own internal Environmental Management Systems (EMS) to minimize and mitigate any environmental impacts resulting from activities awarded by USAID.

## IMPLEMENTATION

In accordance with 22 CFR 216 and Agency policy, the conditions and requirements of this

document become mandatory upon approval. This includes the relevant limitations, conditions and requirements in this document as stated in Sections 3, 4, and 5 of the IEE and any BEO Specified Conditions of Approval.

# USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

**PROJECT/ACTIVITY NAME:** USAID FY 2022 through FY 2024 Bureau for Humanitarian Assistance (BHA) Request for Applications (RFA) for International Food Relief Partnership (IFRP): Shelf-Stable Food Commodity Transportation, Delivery, and Distribution

**Bureau Tracking ID :** https://ecd.usaid.gov/document.php?doc_id=54982

| | | |
|---|---|---|
| **Approval:** | Cleared by email<br>Tim McRae - Acting Deputy Director, Office of Africa, Bureau for Humanitarian Assistance (BHA) | 04/15/2022<br>Date |
| **Clearance**: | Benjamin C Vogler - Clear with edits<br>Ben Vogler, BHA, IFRP Program Manager and AOR | 04/14/2022<br>Date |
| **Clearance**: | Erika J Clesceri clears<br>Erika J Clesceri, BHA Climate Integration Lead (CIL) | 04/15/2022<br>Date |
| **Concurrence:** | Erika J Clesceri clears<br>Erika J Clesceri, BHA Bureau Environmental Officer (BEO) | 04/15/2022<br>Date |

**DISTRIBUTION:**

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# 1.0 ACTIVITY DESCRIPTION

## 1.1 PURPOSE AND SCOPE OF IEE

The purpose of this document is to:

1. In accordance with Title 22, Code of Federal Regulations, Part 216 ( 22 CFR 216), provide a preliminary review of the reasonably foreseeable effects on the environment from USAID intervention described herein and recommend environmental risk determinations and as appropriate, conditions, for these activities.

   Upon approval, these determinations become affirmed, per 22 CFR 216, and specified conditions become mandatory obligations of implementation.

2. In accordance with ADS 201mal, provide a preliminary review of the reasonably foreseeable climate risk to USAID interventions, climate risk ratings and as appropriate, opportunities to reduce climate risks to these activities.

This Request for Applications (RFA) Initial Environmental Examination (IEE) pertains to all activities carried out under IFRP awards. Potential environmental impacts and climate risks and any corresponding mitigation measures are described for proposed project activities. In the case that activities do not fall into the categories detailed in this RFA IEE, the grantee will be responsible for soliciting additional clearances from the Bureau Environmental Officer (BEO).

## 1.2 ACTIVITY OVERVIEW

The International Food Relief Partnership (IFRP) is a USAID program authorized by section 208(a)(2) of the Food for Peace Act, 7 U.S.C. § 1726b(a)(2) to support the production, stockpiling, transportation, delivery, and distribution of shelf-stable, prepackaged foods by U.S. non-profit and Public International Organizations. The goal of the IFRP is to enhance food security of vulnerable populations across the globe through distribution and feeding programs.

Most IFRP grantees also support other ongoing programs with complementary activities that are NOT funded by USAID. Programs may include healthcare services; small-scale construction; gardening, demonstration plots, or the like. These complementary activities are outside of USAID's direct control, and therefore, environmental and climate safeguard measures are managed by the governing organization.

## 1.3 ACTIVITY DESCRIPTION

Table 1 below describes the activities that may be implemented under the IFRP RFA.

**Table 1: Defined Activities**

**Training, Research, and Capacity Building Activities**

Activities include training in improved child care and feeding practices, research into community incidence of malnutrition, community mobilizations and awareness outreach.

**Commodity Management Activities**

Commodity management is the primary focus of IFRP partners. Activities include the storage, distribution and disposal of nutrition commodities.

The products will be delivered to implementing partners in participating countries where they will be stockpiled and distributed to beneficiaries. The Harvest Lentil Pro, Enov' Nutributter (LNS-SQ), and Enov' Mum (LNS-PLW) provisions will help to balance and supplement the diets of vulnerable populations in host countries, including those of children, nursing mothers, and the elderly.

# 2.0 BASELINE ENVIRONMENTAL INFORMATION

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

Activities under IFRP may take place in any of the USAID mission countries or in countries covered by USAID Regional missions. Environmental information for each country and project location varies in physical and topographic conditions, climate, soils, and ecosystems. It is anticipated that IFRP projects will be carried out in urban, peri-urban, and rural settings beset by poverty. All proposed activities are expected to be small in scale

## 2.2 APPLICABLE AND APPROPRIATE PARTNER COUNTRY AND OTHER INTERNATIONAL STANDARDS — ENVIRONMENTAL AND SOCIAL LAWS, POLICIES, AND REGULATIONS

Environmental procedures are detailed in national policies and should be reviewed by IFRP awardees for any pertinent host-country requirements.

# 3.0 ANALYSIS OF POTENTIAL ENVIRONMENTAL IMPACTS AND CLIMATE RISK

This section provides an analysis of the environmental impacts of and climate risks to IFRP activities.

## TRAINING, RESEARCH, AND CAPACITY BUILDING ACTIVITIES

### ENVIRONMENTAL IMPACTS

None.

### CLIMATE RISK CONSIDERATIONS

Climate risks are mainly related to extreme weather events impacting the accessibility of meeting venues, the venues themselves, or participants' abilities to travel to meetings.

## COMMODITY MANAGEMENT ACTIVITIES

### ENVIRONMENTAL IMPACTS

The potential environmental impacts of commodity management include:

1) solid waste generation; and

2) energy use during transportation and preparation of products.

**Solid waste Management**. Solid waste management is a particular concern for IFRP activities due to the need for proper disposal of the food products' packaging and wrappers/sachets. The large levels of solid waste produced from these activities indicate the need for IFRP programs to consider and plan for the best possible disposal options. IFRP programs should consider incorporating sustainable disposal solutions where possible, and reuse and recycling practices should be highlighted in the waste management plan.

For example, Nutributter products are associated with a large amount of solid waste from sachets/wrappers of individually wrapped Nutributter bars. A program distributing 100 Metric Tons (MTs) of Nutributter, will require disposal of approximately 5,000,000 sachets, given each bar weighs 20g[2]. In the case of Breedlove, a program distributing 75 Metric Tons (MTs), 74,976 bags will require disposal, given fifty 20 grams servings are contained per bag[3].

In addition, Breedlove suggests that Styrofoam bowls and plastic spoons are used when serving the lentil soup mix. These plastics products create a significant solid waste stream of non-biodegradable materials,

[2] https://www.nutriset.fr/products/en/enov-nutributter2
[3] https://breedlove.org/index.php?option=com_content&view=article&id=62&Itemid=69

in countries that have limited solid waste landfills and insufficient waste management capacity.

Solid wastes that are improperly managed solid waste can also lead to the clogging of drainage canals and smaller downspouts. These plastic materials can create pockets of standing water that can become disease vector breeding grounds. In addition, these can have various environmental impacts such as pollution and methane emissions from landfills, pollution from incineration, and waste (of raw materials and energy used to make products) when items are thrown away or incinerated rather than reused or recycled.

**Energy Consumption**: The energy consumption related to these activities and the source of the energy, such as fuelwood, may potentially damage the environment as well as be costly or infrequently available. Many cooking practices do not consider cooking time and the amount of energy input required to cook certain products. The IFRP is limited to Harvest Lentil Pro, Enov' Nutributter (LNS-SQ), and Enov' Mum (LNS-PLW) products; however, beneficiaries may also be encouraged to add their own ingredients into recipes to supplement their diet. Harm to the environment could result by providing recipes and suggestions for supplemental foods that are unavailable or require high amounts of energy to prepare and cook. Energy requirements for distribution of food products and feeding equipment may have an impact on the environment as well.

*Please note that for product storage and warehousing, pesticide use is not addressed in this RFA IEE* given that the Harvest Lentil Pro, Enov' Nutributter (LNS-SQ), and Enov' Mum (LNS-PLW) are in plastic or Mylar wrapping which are resistant to pests. Where the grantee may determine a need for pesticide use for product protection, then the grantee should contact the USAID Agreement Officer Representative (AOR) and BEO immediately, as specialized analyses would need to be performed in the form of a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP) to ensure safer use. USAID will assist IFRP partners in complying with the USAID Pesticide Procedures as per 22 CFR 216.3 (b)(l).

## CLIMATE RISK CONSIDERATIONS

Climate risks to commodity management activities primarily include risks to the areas where commodities are stored or access routes for storage and distribution. For example, commodities may be sensitive to temperature or humidity changes; storage facilities may be exposed to floods or storm hazards; and access routes may be affected by extreme weather events such as flooding.

The nature and degree of climate risk for a given commodity depends on the characteristics of the commodity (e.g., usable life span, required storage conditions, intended purpose/use), and , perhaps most importantly, the geography and location(s) where the commodity will be delivered and used.

One storage facility may face much greater risk of flash flooding, high winds, and/or storm surge linked to rising sea levels than a second site due to their respective locations and elevations within a country. It is critical to understand the climate conditions (both historical and future projections, to the degree

possible) for relevant locations in the lifespan of a commodity.

Example climate conditions which might affect commodities:

- High temperatures and/or humidity could affect the integrity or longevity of the commodity and the structure in which it is stored and used.
- Extreme climate events (e.g., storms, flash floods, high wind events) could damage a commodity and the structure in which it is stored and used; affect access routes and limit the ability to transport the commodity; and damage disposal sites (e.g.,, landfills) and expose improperly-disposed of materials.
- Sea-level rise can lead to increased erosion and more intense storm surges, which could damage storage sites, access routes, and disposal sites.
- Drought conditions and changing rainfall patterns could affect water availability, which may impact the ability to use or maintain the commodity.

# 4.0 ENVIRONMENTAL DETERMINATIONS AND CLIMATE RISK RATINGS

## 4.1 RECOMMENDED ENVIRONMENTAL DETERMINATIONS

A **Categorical Exclusion** is recommended for training, research, and capacity building activities pursuant to:

- 22CFR216.2.(c).(2)(i), education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); and

A **Negative Determination with Conditions** is recommended for commodity management activities.

## 4.2 CLIMATE RISK MANAGEMENT

The recommended climate risk ratings for IFRP interventions are based on the anticipated likelihood and severity of climate risk, per 201mal.

A **low** climate risk rating was identified for training, research, and capacity building activities because climate risks are not expected to materially affect the implementation or outcomes of the activity.

A **moderate** climate risk rating was identified for commodity management activities, given that climate risks have the potential to substantially disrupt activities, negatively impacting the success of the project.

See Attachment 1 for the CRM summary table and narrative for IFRP activities.

The following table summarizes the recommended determinations and climate risk ratings based on the environmental analysis conducted. Upon approval, these determinations become affirmed, per 22 CFR 216.

**Table 2: Environmental Determinations and Climate Risk Ratings**

| Activities | Categorical Exclusion | Negative Determination | Positive Determination | Deferral | Climate Risk Rating |
|---|---|---|---|---|---|
| 1) Training, research and capacity building | 22CFR216.2.(c).(2(i) | | | | Low |
| 2) Product management | | X (with conditions) | | | Moderate |

# 5.0 CONDITIONS AND MITIGATION MEASURES

The following conditions and mitigation measures apply to Negative Determination with Conditions activities (commodity management), as defined in Section 4 above.

## 5.1 CONDITIONS

The following 6 conditions describe grantees' environmental compliance, monitoring and evaluation responsibilities throughout the life of the award.

**Condition 1: Packaging Waste Management.** In accordance with the requirements of the RFA (Section IV, B. Technical Narrative, Implementation Plan), all IFRP Grantees must include a commodity-specific, waste management plan with their application that describes how the project will manage product-related solid waste packaging, in particular individual product wrapping/containers/boxes/bags/sachets related to commodity management activities. For each separate packaging product material, IFRP awardees should incorporate reuse or recycling measures, where applicable. Reuse and recycling should be prioritized over incineration of packaging products, and sufficient budget should be allocated for implementation of the waste management plan.

***Note:*** *USAID has developed a Scoping Study on Sustainability in Supply Chains to address the humanitarian packaging waste crisis. The Scoping Study indicates the growing strategic alignment of multilateral partners to improve sustainability in humanitarian supply chains. Factors that have been considered in the packaging waste assessment include: source reduction, sustainable procurement, alternative practices, reuse, recycling, recovery, and disposal. This Scoping Study can be used by IFRP awardees for response to the waste management within IFRP actions.*

*USAID continues to demonstrate its donor support and commitment to addressing climate change through two recent policy-level changes. USAID has provided official donor support to addressing climate change through the signing of the ICRC Climate and Environment Charter as a "Supporter." In addition, USAID released the Draft Climate Strategy at the Chief of Party (COP) in Glasgow in November 2021. The Special Objective (SpO) of USAID's Draft Climate Strategy includes the focus on climate justice reforms for 1) improved operations; 2) supply chain efficiencies; and 3) Diversity, Equity, Inclusion, and Accessibility (DEIA) of climate staff across USAID and partner activities. IFRP awardees should note that as a result of the SpO, USAID is in the process of developing an ongoing climate risk analysis of the humanitarian supply chain.*

**Condition 2: Efficient Energy Use.** In accordance with the requirements of the RFA (Section IV, B. Technical Narrative, Implementation Plan), all IFRP Grantees must plan of energy use efficiency in preparation of IFRP commodities.

**Condition 3: Environmental Budgeting.** Sufficient budget will be allocated for implementation of environment and climate safeguarding measures, including implementation of the waste management plan and planning for energy use efficiency. Refer to the USAID Environmental Budgeting Toolkit for step-by-step guidance for both budget developers and USAID budget reviewers. While the BEO can provide guidance on budgeting for environmental compliance, only the AOR can authorize budget commitments.

**Condition 4: Oversight and Reporting.** As required by ADS 204.5.4, the AOR, in consultation with IFRP grantees, MEO, BEO and CIL, will monitor and evaluate whether environmental consequences unforeseen under activities covered by this RFA IEE arise during implementation.

**Condition 5: Environmental Governance.** Implementation will in all cases adhere to applicable host country environmental laws.

**Condition 6: Public International Organizations (PIOs).** Where IFRP grantees work with PIOs on supplementary activities (such as healthcare provision, small-scale construction, or demonstration plots/gardening) that are not funded by USAID, PIOs must follow their own internal Environmental Management Systems (EMS) to minimize and mitigate any environmental impacts resulting from activities awarded by USAID.

**Note:** *USAID reserves the right to request the environmental safeguarding approach in use by PIOs. Where PIO environmental policies do not appear to fulfill "the purpose and intent of the environmental impact assessment requirements of USAID" then the BHA BEO may review and recommend environmental management strategies to improve project design and implementation. While USAID has no direct control over these supplemental activities, Attachment 3 provides information on the typical environmental impacts of these activities, corresponding mitigation measures, as well as climate risks to these activities and climate risk management opportunities. This attachment can be used as a guide, as needed, to support PIOs in environmental and climate safeguarding.*

*Please be aware that PIOs may take advantage of the Nexxus Environmental Assessment Tool (NEAT+). NEAT+ is based in Kobo Toolbox, open-source software for project level assessment of the current sensitivity of the local environment, highlighting any underlying vulnerabilities.*

## 5.2 MITIGATION MEASURES

The mitigation measures presented in this section constitute the minimum required based on available

information at the time of this IEE and the environmental analysis in Section 4.

## TRAINING, RESEARCH, AND CAPACITY BUILDING

While training, research, and capacity building activities qualify as a categorical exclusion, IFRP grantees should consider using methods to eliminate, reduce or recycle waste as described in the Attachment 2: Green Meetings Checklist.

## COMMODITY MANAGEMENT ACTIVITIES

TABLE 3: SUMMARY OF MITIGATION MEASURES FOR COMMODITY MANAGEMENT

| Commodity Management | Mitigation Measures |
|---|---|
| Product storage, distribution, use, and disposal. | *Waste minimization*- through elimination, recovery, reuse, recycling, or remanufacturing, of product packaging such as product shipping boxes, wrapping, containers, sachets, and bags. |
| | *Waste reduction and disposal*- IFRP should prioritize re-usable material and food containers over non-reusable food containers and utensils. For non-reusable wastes, such as product wrappers or sachets, grantees should seek ways to confine and condense these wastes in order to minimize the space required for their final disposal. For example, grantees could promote the use of soft-sided reusable bags or cardboard boxes to contain and reduce storage space requirements of waste wrappers. |
| | *Final disposal via burning or land burial*- non-biodegradable plastic wastes can be burned for final disposal. Also, these wastes can be buried at designated landfills or waste dumps. All polyvinyl chloride (PVC) plastics should be buried, not burned. |
| | *Discourage uncontrolled or illegal dumping*- instead promote disposal of wastes in government established sanitary landfills or dumps. |
| | *All IFRP waste management strategies should make use of the principles of integrated waste management embodied in the USAID Sector Environmental Guideline Solid Waste.* |
| Energy Use | *Reducing energy use.* Training in food product recipes and use of supplemental ingredients that require less cooking time will save beneficiaries fuel energy. The recipes and training programs should include instructions on proportions so food can be cooked quickly or consumed immediately without re-cooking. Training programs on cooking practices and recipes, can also promote important behavioral change that results in reductions in energy use by target households.<br><br>IFRP grantees should refer to the USAID Clean and Efficient Cooking Technologies and Fuels toolkit for guidance on promoting sustainable energy use in their activities. |

## 6.0 LIMITATIONS OF THIS INITIAL ENVIRONMENTAL EXAMINATION

The determinations recommended in this document apply only to interventions described herein. Other activities that may arise must be documented in either a separate IEE, an IEE amendment if the activities are within the same activity, or other type of environmental compliance document and shall be subject to an environmental review.

Other than activities determined to have a Positive Threshold Decision, it is confirmed that the activities described herein do not involve actions normally having a significant effect on the environment, including those described in 22CFR216.2(d).

It is confirmed that the activities described herein do not involve any actions listed below. Any of the following actions would require additional environmental analyses, environmental determinations and climate risk management screening:

- Support project preparation, project feasibility studies, or engineering design for activities listed in §216.2(d)(1);
- Affect endangered and threatened species or their critical habitats per §216.5, FAA 118, FAA 119;
- Provide support to extractive industries (e.g. mining and quarrying) per FAA 117;
- Promote timber harvesting per FAA 117 and 118;
- Support agro-processing or industrial enterprises per §216.1(b)(4);
- Provide support for regulatory permitting per §216.1(b)(2);
- Lead to privatization of industrial facilities or infrastructure with heavily polluted property per §216.1(b)(4);
- Procure or use genetically engineered organisms per §216.1(b)(1); and/or
- Assist the procurement (including payment in kind, donations, guarantees of credit) or use (including handling, transport, fuel for transport, storage, mixing, loading, application, clean-up of spray equipment, and disposal) of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials. Pesticides cover all insecticides, fungicides, rodenticides, etc. covered under the Federal Insecticide, Fungicide, and Rodenticide Act per §216.2(e) and §216.3(b).

## 7.0 REVISIONS

Per 22 CFR 216.3(a)(9), when ongoing programs are revised to incorporate a change in scope or nature, a determination will be made as to whether such change may have an environmental impact not previously assessed. If so, this IEE will be amended to cover the changes. Per ADS 204, it is the responsibility of the USAID AOR and awardees to keep the MEO/REA and BEO informed of any new information or changes in the activity that might require revision of this environmental analysis and environmental determination.

## ATTACHMENTS:

**ATTACHMENT 1: CLIMATE RISK MANAGEMENT SUMMARY TABLE**

**ATTACHMENT 2: GREEN MEETING CHECKLIST**

**ATTACHMENT 3: ENVIRONMENTAL AND CLIMATE CONSIDERATIONS FOR SUPPLEMENTAL ACTIVITIES**

# ATTACHMENT 1: CLIMATE RISK MANAGEMENT SUMMARY TABLE

## CLIMATE RISK MANAGEMENT SCREENING SUMMARY

Following the ADS Mandatory Reference 201mal, this IEE provides a Climate Risk Management (CRM) Summary Table and accompanying narrative for Activity Types rated as Low and Moderate Climate Risk (Table 4). It is only necessary to complete the first three columns (up through the Risk Rating) for Activity Types rated as Low Climate Risks.

### CLIMATE RISK MANAGEMENT SUMMARY TABLE

TABLE 4. IFRP RFA IEE CLIMATE RISK MANAGEMENT SUMMARY TABLE

| **Activity Types** | **Timeframe** | **Geography** | **Climate Risks** | **Risk Rating Low/ Moderate/ High** | **How risks are Addressed at Project Level** | **Further Analysis and Actions for Activity Design/ Implementation** | **Opportunities to Strengthen Climate Resilience** |
|---|---|---|---|---|---|---|---|
| Training, Research, and Capacity Building | Not applicable at RFA-IEE level | | Location of activities (e.g., workshop and training activities) may be exposed to climate risks, particularly climate-related extreme events (e.g., floods, extreme rainfall events, and storm surges), affecting both structural integrity of the building as well as the ability of participants to reach the activity.<br><br>Increased temperatures, as well as the increasing frequency and/or severity of | Low | Not required for Low Climate Risks | | |

| Activity Types | Timeframe | Geography | Climate Risks | Risk Rating Low/ Moderate/ High | How risks are Addressed at Project Level | Further Analysis and Actions for Activity Design/ Implementation | Opportunities to Strengthen Climate Resilience |
|---|---|---|---|---|---|---|---|
| | | | heat waves, and storms could affect the comfort and ability of individuals to participate in activities | | | | |
| Commodity Management Activities | Not applicable at RFA-IEE level | | Partners are encouraged to assess site-specific risks which may include:<br>● High temperatures and/or humidity could affect the integrity or longevity of the commodity and the structure in which it is stored and used.<br>● Extreme climate events (e.g., storms, flash floods, high wind events) could damage a commodity and the structure in which it is stored and used; affect access routes and limit the ability to transport the commodity; and damage disposal sites (e.g., landfills) and expose improperly-disposed of materials.<br>● Sea-level rise, increased erosion and more intense storm surges, could damage storage sites, | Moderate | Risks Accepted at RFA-level | Not applicable at RFA-IEE level | Partners are encouraged to consider the following opportunities to reduce climate risk:<br>● Prepare to manage activities adaptively and communicate frequently. For example, partners should establish alternate dates for meetings and deliveries, and location-based activities could include plans to use alternate access routes. This creates opportunities to establish conditions for preparedness, active learning and needed corrections during implementation.<br>● Consider potential climate impacts in the placement and storage |

| Activity Types | Timeframe | Geography | Climate Risks | Risk Rating Low/ Moderate/ High | How risks are Addressed at Project Level | Further Analysis and Actions for Activity Design/ Implementation | Opportunities to Strengthen Climate Resilience |
|---|---|---|---|---|---|---|---|
| | | | access routes, and disposal sites.<br>● Drought conditions and changing rainfall patterns could affect water availability, which may impact the ability to use or maintain the commodity. | | | | of equipment and commodities to ensure longevity.<br>● Plan with flexibility for the impacts of increased energy stress on commodity storage warehouses. |

## CLIMATE RISK MANAGEMENT SCREENING SUMMARY NARRATIVE

This climate risk management screening is conducted at the global level for IFRP. Given that the specific geographies (e.g. country, region, and coastal proximity), climate conditions, adaptive capacity, and other key characteristics that can shape risk are not yet defined at this level of analysis, the screening focuses on risks that can be broadly applied for a specific type of activity.

A critical resource used in identifying and assessing the climate risks was USAID's Climate Risk Screening and Management Tool for Strategy Design + Annexes (available at https://www.climatelinks.org/resources/climate-risk-screening-management-tool).

## ATTACHMENT 2: GREEN MEETINGS CHECKLIST

(Applicable to IFRP grantee and Healthcare Facilities)

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

Consider the following as you select your environmental priorities:

### *Preventing and Reducing Waste*

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

### *Recycling and Managing Waste*

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

### *Conserving Energy and Reducing Traffic*

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

## *Contracting Food Service and Lodging*

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

## *Buying Environmentally Aware Products*

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

## *Educating Participants and Exhibitors*

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

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

# ATTACHMENT 3: ENVIRONMENTAL AND CLIMATE CONSIDERATIONS FOR SUPPLEMENTAL ACTIVITIES

While the focus of IFRP grants is nutritional commodity management, most IFRP grantees also support other ongoing programs with complementary activities that are NOT funded by USAID. Supplemental programs may include the following:

**Healthcare services,** including limited healthcare provision in support of activities aiming to reduce malnutrition, such as vaccinations or blood iron level sampling, or provide training on the provision of these healthcare services. This may also include the distribution of pharmaceuticals or Long-Lasting Insecticidal Nets (LLINs)

**Small-scale construction,** including rehabilitation and repair of buildings and facilities (i.e., hospitals, schools, clinics, community centers).

**Gardening and demonstration plots,** including demonstration and household vegetable gardens used to illustrate agricultural methods for growing vegetables to supplement the Harvest Lentil Pro product. These gardens provide a hands-on learning experience for beneficiaries.

These complementary activities are outside of USAID's direct control, and therefore, environmental and climate safeguard measures are managed by the governing organization. However, as a resource, the following sections provide information on typical environmental risks of these activity types, climate risks TO these activities as well as recommended mitigation measures and climate risk management opportunities that may be used in support of PIO environmental management systems (EMS).

## 1. TRAINING AND PROVISION OF HEALTHCARE SERVICES

### POTENTIAL ENVIRONMENTAL IMPACTS

The provision of healthcare services, or training in healthcare service provision, can be expected to produce potentially hazardous medical wastes in the form of sharps and used blood slides and sampling equipment as well as non-hazardous general medical wastes (plastic packaging materials, consumables, etc.). Improperly managed medical waste can result in increased disease transmission or other threats to public health. For example, rotting organic materials can serve as breeding grounds for disease vectors and sharps from vaccination activities or blood iron level sampling can pose health risks to health clinic patients, staff and nearby residents if improperly stored and disposed of. These wastes generally fall into one of four categories:

1) **General healthcare waste,** similar or identical to domestic waste, including materials such as packaging or unwanted paper. This waste is generally harmless and needs no special handling; 75–90% of waste generated by healthcare facilities falls into this category;

2) **Hazardous healthcare wastes** including infectious waste (except for sharps and waste from patients with highly infectious diseases), small quantities of chemicals and pharmaceuticals, and non- recyclable pressurized containers and

3) **Highly hazardous healthcare wastes** including sharps, highly infectious non-sharp waste, stool from cholera patients, and bodily fluids of patients with highly infectious diseases.[4] Transmission of disease through infectious waste is the greatest and most immediate threat from healthcare waste. If waste is not treated in a way that destroys the pathogenic organisms, dangerous quantities of microscopic disease-causing agents—viruses, bacteria, parasites or fungi—will be present in the waste. These agents can enter the body through punctures and other breaks in the skin, mucous membranes in the mouth, by being inhaled into the lungs, being swallowed, or being transmitted by a vector organism. Contamination of water supply from untreated healthcare waste can also have devastating effects.

4) **Pharmaceutical Wastes and Medical Supplies**: Pharmaceutical drugs including vaccines have specific storage time and temperature requirements, and may expire or lose efficacy before they are used, particularly in remote areas where demand is low and/or infrequent. Pharmaceutical waste may also accumulate due to inadequacies in stock management and distribution and/or lack of a routine system of disposal.

***Note on LLINs:*** *The distribution of LLINs carries risks related to public health due to exposure to pesticide residues in LLINs; threats to aquatic species due to pesticide exposure (if nets are washed in rivers or used for fishing); disruptions to fish populations and food chains when LLINs (which have small mesh) are used in fishing, resulting in over-fishing of juvenile fish; and solid waste that results when LLINs are improperly disposed of.*

## SUGGESTED MITIGATION MEASURES

**Healthcare waste management.** Ensure appropriate management[5] of healthcare waste. In particular, adequate procedures and capacities must be in place to appropriately handle, label, treat, store, transport and dispose of blood, sharps and other medical waste and that norms and training include environmental

[4] Source WHO (1999). Safe Management of Wastes from Health-Care Activities/ edited by A. Pruss, e. Giroult, P . Rushbrook., Geneva, World Health Organization - *Chapter 9: Application of Treatment and Disposal Methods to Health Care Waste Categories.* http://www.who.int/water_sanitation_health/medicalwaste/wastemanag/en/http://www.who.int/water_sanitation_health/medicalwaste/wastemanag/en/

[5] *For USAID, "Appropriate Management" of health care wastes is defined as being in substantial conformity with the USAID's Sector Environmental Guidelines (SEG) "Health Care Waste" chapter, particularly the section titled, "Minimum elements of a complete waste management program." Other important references to consult for sound waste management practices are "WHO's Safe Management of Wastes from Healthcare Activities."*

health considerations.

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

**Alternative disposal techniques** for disposal of hazardous medical wastes such as sharps, blood slides, etc. may also be promoted given lack of access to infrastructure or capacity to treat wastes safely via incineration. As an alternative to incineration, project managers may, (using guidance from the USAID Sector Environmental Guideline for Healthcare Waste), consider the feasibility of disinfecting sharps via autoclaving, encapsulating them in a puncture proof box and then bury or transport them to a centralized disposal site. Appropriate low cost treatment options for sharps and other infectious wastes have focused largely on burial, encapsulation and autoclaving (sterilization by steam and pressure).

**Shredding of waste and landfill disposal is required following autoclaving**. Burial pit and site must be adequately selected for the goal of excluding the possibility of people and animals coming into contact with hazardous or infectious wastes (this must include consideration of drinking water contamination risks). Indeed, in developed countries, many hospitals and other generators have moved away from incineration to autoclaving, responding to increasingly stringent emission controls, cost arguments, and public acceptance.

**Monitoring and safe disposal of LLINs.** Environmentally preferred options for LLINs and LLIN packaging include: 1. Use the net as long as possible; 2. Re-use the net for other purposes not harmful to the environment and health; 3. Recycle; 4. Dispose safely. Beneficiary training must include aspects of environmental impact as in the following: proper washing; avoidance of misuse; opportunities for safe re-use; and disposal or recycling.

## POTENTIAL CLIMATE RISKS

Climate risks to healthcare service provision activities primarily include risks to health facilities and access routes to health facilities related to extreme weather events that result in flooding, high winds, landslides, and extreme heat..For example, flooding may damage critical roads and instructure, making access to health facilities difficult. In addition, during extreme heat, patients who live far from health care services and facilities may be less likely to walk to access required services. Furthermore, climate

change and variability, particularly increased temperatures and changing rainfall patterns, has the potential to increase the prevalence of climate sensitive health outcomes, such as water and vector borne diseases. This may affect community health, including healthcare workers health, as well as supply and demand requirements for pharmaceuticals.

### SUGGESTED CLIMATE RISK MANAGEMENT OPPORTUNITIES

There is an opportunity to train healthcare service providers on the impacts of climate change on various diseases, and improve understanding of the challenges that patients face during extreme weather events to access goods and services. There is also an opportunity to conduct training in locations and during the months that are less likely to experience extreme weather. Furthermore, providing contingent plans during extreme weather for patients to access services could limit the impact of extreme climate and weather events on communities health. Lastly, providing communities with information about how climate may impact health service access (i.e. through floods or extreme heat limiting access) and climate sensitive health diseases (such as water- and vector- borne diseases) may help decrease future climate impacts.

## 2. SMALL-SCALE CONSTRUCTION

### POTENTIAL ENVIRONMENTAL IMPACTS

Small-scale construction activities can result in a number of environmental impacts that include the following:

**Disturbance to existing landscape/habitat.** Construction typically necessitates clearing, grading, trenching and other activities that can result in near-complete disturbance to the pre-existing landscape/habitat within the plot or right-of-way. If the plot or right-of-way contains or is adjacent to a permanent or seasonal stream/waterbody, grading and leveling can disrupt local hydrology.

**Sedimentation/fouling of surface waters.** Runoff from cleared ground or materials stockpiles during construction can result in sedimentation/fouling of surface waters, particularly if the site is located in close proximity to a stream or waterbody.

**Standing water.** Construction may result in standing water on-site, which readily becomes breeding habitat for mosquitoes and other disease vectors. This is a particular concern in areas where malaria is endemic.

**Occupational and community health and safety hazards.** The construction process and construction sites present a number of hazards: fall and crush injuries, hazards from hand or power tools and equipment used in construction, and exposure to hazardous substances, such as solvents in paint, cement dust, etc.

**Increased Air and Noise Pollution** can result during construction or rehabilitation from the actions of construction equipment and workers.

**Appropriate design.** Construction designs simply replicating local community designs, in the absence of engineering standards, may not be appropriate.

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

**Adverse impacts of materials sourcing.** Construction requires a set of materials often procured locally: timber, fill, sand and gravel, bricks. Unmanaged extraction of these materials can have adverse effects on the environment. For example, stream bed mining of sand or gravel can increase sedimentation and disturb sensitive ecosystems; purchase of timber from unmanaged or illegal concessions helps drive deforestation.

## SUGGESTED MITIGATION MEASURES

**Design considerations appropriate for local climate conditions** such as use of hurricane straps on roofing, rei-einforced walls and load bearing structures in earthquake prone areas, proper drainage ways for flood and rain season, appropriate ventilation and air flow for hot climates.

**Plan for sound waste disposal** including provisions for sound disposal of all wastes generated during construction in a government approved landfill. Disposal on-site via burial in an area designated for waste disposal is also an alternative disposal option.

**On-site sorting of construction wastes** based on type of waste (organics/bio-degradable wastes, general non-biodegradable solid wastes, recyclable/reusable (metals, concrete, timber) and hazardous wastes etc.) can facilitate storage, transport and final disposal or re-use.

Selection of non-hazardous construction materials whenever possible. By avoiding the use of hazardous construction materials potential human health and environmental risks are minimized during handling, transport, storage, use and eventual disposal of these materials.

**Promote sustainable sourcing of local materials.** All local material sourcing activities must avoid sourcing materials from sensitive or protected ecosystems (i.e. forests, river banks and beds, wetlands and hillsides)

**Adherence to host-country construction codes and relevant laws.** The project must identify and comply with applicable host nation laws, and local ordinances.

**Soil stability and drainage measures.** During construction site preparation (land leveling, backfilling, drainage work, demolition, etc.) resulting soil destabilization and water diversion impacts require mitigations (such as the use of hay bales, planting of vegetation, drainage system installation, etc.) to minimize erosion and control water run-off.

**Testing for asbestos.** If the presence of Asbestos is suspected in a facility to be renovated, the facility must be tested for asbestos before rehabilitation works begin. Should asbestos be present, then the work must be carried out in conformity with host country requirements, (if any) and in conformity with guidance to be provided by the MEO, in consultation with the REA. All results of the testing for asbestos shall be communicated to the C/AOR

**Reference:** Undertake construction in a manner generally consistent with the guidance for environmentally sound construction in the USAID Sector Environmental Guideline for Construction.

## POTENTIAL CLIMATE RISKS

Typical climate risks to construction include threats to the integrity of infrastructure due to changes in the frequency or severity of extreme weather events such as rainfall, flooding, increased temperatures,

landslides, or erosion. If there is new construction, then choosing sites that are less exposed to climate change stressors and extreme weather events, such as flooding, is critical to limit climate impacts. In coastal areas, rising sea levels and storm surge can also threaten infrastructure. During construction, the implementer should be aware of risks due to extreme weather, such as extreme heat and flooding, and how that will impact worker productivity and health. Other impacts to consider include changes in occupancy comfort due to increases in temperature, humidity, or rainfall; increased demand (and costs) of building cooling due to increased temperatures; and the disruption of building systems (including water and waste services) due to changes in precipitation rates and levels. Lastly, materials for construction should be selected that are suitable for both local historical and predicted future climates.

### SUGGESTED CLIMATE RISK MANAGEMENT OPPORTUNITIES

There are several opportunities to limit climate risks and integrate climate change into small scale construction projects. Construction designers should consider both current and future climate and weather when conducting projects. Furthermore, working directly with material suppliers, implementers can discuss which materials are suitable for specific climates. Construction can be conducted in a way that maximizes natural cooling, and heating, as necessary. Lastly, working closely with community members to limit climate risks, and maximize natural heating and cooling, into construction may help educate community members and improve future construction projects within the community.

## 3. GARDENING AND DEMONSTRATION PLOTS

### POTENTIAL ENVIRONMENTAL IMPACTS

Gardens, while providing important supplemental nutrients and calories, have the potential to cause environmental impacts when not managed appropriately, including the following:

**Soil erosion (and siltation of water bodies) or loss of soil fertility** due to improper soil tilling techniques or irrigation

**Water shortages or conflicts** resulting from an upset to existing water use sharing.

**Crop failure, increased agro-chemical use and over-extraction of water** from selection of crops not adapted to local conditions and poor water management

**Invasive species** may, inadvertently be introduced, negatively impacting native flora and fauna.

*Note: Under USAID regulations (pursuant to 22 CFR 216.3(b),) the BEO must approve all proposed pesticides prior to their use, regardless of funding source, in the form of a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP).*

## SUGGESTED MITIGATION MEASURES

**Promoting soil fertility.** Repeated seasons of intensive cultivation should be balanced with sufficient fallow, or incorporation of additional organic materials or cover cropping to replenish essential nutrients. Soil fertility and water absorption capacity are both greatly improved when soils contain sufficient organic content.

**Preventing soil erosion.** In hillside plots, contour planting, soil stabilization structures and low till field preparation practices can also help reduce erosion.

**Drainage.** Channeling excess water runoff into soak pits located around garden also reduces risk of silt build-up in natural drainage ways and nearby surface waters, while also conserving water and helping groundwater recharge.

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

**Water resource management.** Assess water available for irrigation and verify that there is sufficient water available to support the production of home garden crops

**Reference:** Refer to the USAID Sector Environmental Guideline: Crop Production for additional mitigation measures, tools, and resources for reducing soil erosion, preventing the loss of soil fertility, and reducing water consumption.

**Additional guidance** on low input gardening and soil and water resource protection can be obtained from the John Snow International: Growing Positively Low Input Gardening http://www.jsieurope.org/docs/growing_positively_book.pdf.

## POTENTIAL CLIMATE RISKS

Potential climate risks to gardening and demonstration plots include impacts to overall water availability affecting irrigation requirements; increasing temperature and humidity threatening temperature-sensitive crops; changes in temperature and/or precipitation increasing the prevalence or type of pest outbreaks; climate-related extreme events causing direct damage to crops and gardens; and, in coastal areas, sea level rise directly impacting crops through increased storm surge or saltwater intrusion.

## SUGGESTED CLIMATE RISK MANAGEMENT OPPORTUNITIES

One opportunity is to discuss historical climate conditions, and observed trends, with community gardeners. This could contribute to a broader educational conversation about how climate, particularly

changing rainfall patterns, like later starts to the rainy season and increased temperatures, may impact certain crops. Furthermore, there is an opportunity to educate community farmers on climate smart agriculture techniques at a small scale, which may be beneficial skills during implementation of this project and in the future. Lastly, there may be opportunities to partner with local actors in the value chain, from farmers to seed providers, to discuss and address climate related challenges.