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DCN: OAPA-17-NOV-PAK-0004

PAKISTAN

**Initial Environmental Examination (IEE), Amendment No. 9
Improved Maternal and Child Health Outcomes in Focus Areas**

Program/Project/Activity Data:

Activity/Project Title: Improved Maternal and Child Health Outcomes in Focus Areas • Infectious Disease Prevention and Control Program (\$80 million) • Improved Child Health in FATA (\$100 million) • Maternal Child Health (MCH) Program (\$400 million)		Solicitation #: N.A.
Contract/Award Number (if known): N.A.		
Geographic Location : Pakistan; 391		
Originating Bureau/Office: USAID Pakistan, Health Office		
Supplemental IEE: ☐ Yes ☒ No Amendment: ☒ Yes ☐ No Programmatic IEE: ☐ Yes ☒ No		DCN and date of Original document: Asia 10-02 Pakistan IEE-ETD, approved on October 23, 2009 DCN and ECD link(s) of Amendment(s): Amendment No. 1 OAPA-11-NOV-PAK-0002, approved on November 30, 2010; Amendment No. 2 OAPA-11-AUG-PAK-0036, approved on August 11, 2011; Amendment No. 3 OAPA-12-MAR-PAK-0019, approved on March 15, 2012; Amendment No. 4 OAPA-12-JUL-PAK-0031, approved on July 11, 2012; Amendment No. 5 OAPA-13-APR-PAK-0013, approved on April 26, 2013; Amendment No. 6 OAPA-14-JUL-PAK-0033, approved on July 28, 2014; Amendment No. 7 OAPA-14-SEP-PAK-0037, approved on September 08, 2014; Amendment No. 8 OAPA-15-MAY-PAK-0018, approved on May 12, 2015 Amendment No.: 9
Funding Amount: \$580,000,000		Life of Project Amount: \$580,000,000
Implementation Start/End: FY 2009 – December 31, 2020		
Prepared By: Monica Villanueva MCH Program Team Lead- Health		Date Prepared: November 3, 2016
Expiration Date (if any): December 31, 2020		Reporting due dates (if any): N.A.
Environmental Media and/or Human Health Potentially Impacted (check all that apply): None ☐ Air ☒ Water ☒ Land ☒ Biodiversity ☐ Human Health ☒ Other ☐		
Recommended Threshold Determination: ☒ Negative Determination ☒ with conditions ☒ Categorical Exclusion ☐ Positive Determination		☐ Deferral ☐ Exemption ☐ USG Domestic NEPA action
Climate Change: ☐ GCC/Adaption ☐ GCC/Mitigation ☒ Climate Change Vulnerability Analysis (included) Adaptation/Mitigation Measures: Included		

SUMMARY OF FINDINGS:

1.0 Purpose and Scope of IEE

The purpose of this Amendment No. 9 of the IEE: Asia 10-02 Pakistan IEE-ETD and the Amendment No. 1: OAPA-11-NOV-PAK-0002, Amendment No. 2: OAPA-11-AUG-PAK-0036, Amendment No. 3: OAPA-12-MAR-PAK-0019, Amendment No. 4: OAPA-12-JUL-PAK-0031, Amendment No. 5: OAPA-13-APR-PAK-0013, Amendment No. 6: OAPA-14-JUL-PAK-0033, Amendment No. 7: OAPA-14-SEP-PAK-0037, and Amendment No. 8: OAPA-15-MAY-PAK-0018 is to:

- a) add nine new activities to the Maternal and Child Health (MCH) Program (“the MCH Project”), and
- b) extend its Life of Project (LOP) from December 31, 2019 to December 31, 2020.

This IEE Amendment, in accordance with 22 CFR 216, provides a review of the reasonably foreseeable effects on environment, and recommends decisions of Threshold Determinations for the new activities under the MCHP. This Amendment provides a brief statement of the factual basis for a Threshold Decision and recommends Categorical Exclusion and Negative Determination with Conditions for the new MCH Project activities.

The scope and nature of all previously approved activities remain the same. All previously approved threshold determinations, conditions, limitations, and stipulations for revision remain in force.

2.0 Project Background

The MCH Project is managed by the Mission’s Office of Health Population and Nutrition (OHPN). It supports the Mission’s Development Objective 5 (DO5): “Improved maternal and child health outcomes in focus areas.” The program further supports all three Intermediate Results (IR): IR 1 - “utilization of quality services,” IR2 - “improved nutrition and Water and Sanitation (WASH) practices,” and IR 3 - “strengthened health system.”

The MCH Project supports innovative approaches to strengthen the capacity of Pakistan's public and private healthcare sectors to deliver high-impact services that reduce maternal, newborn, and child mortality and morbidity, as well as improves reproductive health outcomes and increases family planning utilization. The MCH Project activities are implemented by national and internationally renowned public health organizations to implement evidence-based interventions. The implementing partners include John Snow International, Jhpiego, Chemonics, U.S. Pharmacopeial, John’s Hopkins University, Palladium, UNICEF, World Food Program, and the World Bank.

3.0 Project/Activity Description

The MCH Project has been amended to realign the budget and add nine new activities to the MCH Project. One of these, the Water, Sanitation and Hygiene Activity is an existing activity, with an approved IEE, that is now being subsumed under the Project. Some of the activities are being contracted through USAID/Washington contracting mechanisms and, therefore, also have existing IEEs. Following is the description of the new activities, some of which have already approved IEEs.

3.1 The Family Planning Training Activity will be implemented by Jhpiego under the Maternal and Child Survival Program, an existing Washington-based cooperative agreement. This activity will train public sector providers from Sindh, Punjab, and Balochistan provinces on family planning

counseling and service provision; provide technical assistance to public health training institutions to enhance their family planning programs; and carry out a pilot to test the feasibility of task-shifting the provision of injectable contraceptive to community health workers. This activity is critical to ensuring that the OHPN meets its Family Planning 2020 goal for Fiscal Year 2017.

This activity is a Mission buy-in to the USAID/Washington centrally funded Maternal, Newborn, and Child Health Project. It has a Global Health Bureau-approved IEE (# GH-13-16), approved 2/4/13. The Environmental Threshold Decision is Negative Determination with Conditions. Activities identified as having potential environmental impact include: 1) procurement, storage, management, and disposal of public health commodities; 2) actions that indirectly result in the generation of and disposal of hazardous or highly hazardous waste; 3) malaria control programs; 4) small scale water and sanitation activities; 5) small scale gardening activities, and 6) small-scale rehabilitation of health facilities. Of these "actions that indirectly result in the generation of and disposal of hazardous or highly hazardous waste" applies to the Family Planning Training activity since it involves the use and disposal of family planning commodities procured and stored by the GOP. The referenced IEE requires, as a condition, the preparation and approval of an EMMP by the Bureau Environmental Officer/Global Health (BEO/GH), before the commencement of activities. Field activities have not yet commenced. A workplan is being developed, based on which the EMMP will be drafted for BEO/GH approval prior to implementation.

3.2 Enhancing Private Sector Support Activity will increase availability, improve quality, and expand coverage of essential health products and services in maternal and child health in the private sector. In particular, this activity will undertake a comprehensive assessment to inform future USAID investments in the private sector; scale-up a successful diarrhea treatment pilot funded by USAID in 2010; and design a private sector communication strategy to increase demand and use of chlorhexidine for new-born umbilical cord infections. The formulation is chlorhexidine digluconate (7.1 percent) in the form of a gel that will be used as an antiseptic in neo-natal care. This activity involves the development of a marketing and communication strategy for pharmaceutical companies to increase the demand for chlorhexidine. Chlorhexidine and diarrhea treatments will not be purchased under this activity.

This activity will be implemented by Abt Associates through a Mission buy-in to the USAID/Washington, centrally-funded Health Private Sector Flagship Project. It has a Global Health Bureau-approved (8/20/14) IEE. The Environmental Threshold Decision is Negative Determination with Conditions. Activities identified as having potential environmental impact include: a) procurement, storage, management, and disposal of public health commodities; b) actions that indirectly result in the generation of and disposal of hazardous or highly hazardous waste; and c) small-scale rehabilitation of health facilities. None of these activities will be implemented under the proposed follow-on Enhancing Private Sector Support Activity. As the Enhancing Private Sector Support Activity will only provide technical assistance, none of these potential impacts apply to its activities. As a condition of the referenced IEE, the contractor is required to submit, annually, an Environmental Mitigation and Monitoring Report for approval of the BEO/GH. A workplan is being developed, based on which the EMMP will be drafted for BEO/GH approval prior to implementation.

3.3 Design of Mission's Government to Government (G2G) Activity will be implemented by Dexis Consulting Group under the Global Health-Program Cycle Improvement Project (GH Pro), a USAID/Washington field support mechanism. This activity will provide a short-term consultant to assist OHPN in designing a health activity for the Government of Pakistan (GOP). The IEE for GH Pro (IEE # GH-16-15) was approved by the BEO/GH on September 8, 2016. The Environmental Threshold Decision is a Categorical Exclusion. The Mission-planned activities through this buy-in involve only

technical assistance for analyses, meetings and workshops and so conform to the terms of the Categorical Exclusion. The duration of the activity is approximately 12 weeks during which time the scope of the activity is not expected to change.

3.4 Water, Sanitation and Hygiene Activity is an existing activity that is now being subsumed under the MCH Project (in DO5), previously falling under the DO 3 Strategic Framework. It is being implemented under a Public International Organization (PIO) grant to the World Bank to support their Water and Sanitation Program (WSP) through September 2017. It will enhance the World Bank's ongoing leadership in the sector to improve hygiene indicators across Pakistan. It will enable critical governance and administrative reforms to support different levels of public sector institutions responsible for water and sanitation service delivery, and improved hygiene to scale up good practices through their own, government, and donor-assisted investments. This activity tests, documents and disseminates successful new business and governance models adapted to the diversity of contexts in Pakistan. It also provides technical support to committed provincial governments to scale up successful rural sanitation models in districts with poor sanitation indicators. The WSP activities funded by USAID are "soft-interventions" including advocacy, stakeholder consultations, policy reforms and program designs.

This activity was approved under the USAID/Pakistan Municipal Services Program IEE (OAPA-13-SEPT-PAK-0023) approved 9/4/13. The Environmental Threshold Decision for the Project was Categorical Exclusion, Negative Determination with Conditions, and Positive Determination. As the WSP component is a PIO Grant to the World Bank, they are required to invoke their internal environmental and social safeguards. There was no requirement for environmental compliance reporting to USAID. The referenced IEE awarded a Categorical Exclusion for "technical assistance for the preparation of drinking water, sanitation management master plans." The World Bank WSP activities involve only technical assistance and so conform to the terms of the Categorical Exclusion.

3.5 Direct Support to the Ministry of National Health Services, Regulations and Coordination Activity will strengthen the Health Planning Systems Strengthening and Information Analysis Unit (HPSIU) - a new unit within the Ministry of Health, to assume the role of shepherding health systems strengthening initiatives for the country. The Unit will provide short- and long term technical assistance for: developing key organizational and policy documents to streamline health planning and reform; development of an online integrated health information system; maintaining and updating the Monitoring & Evaluation Dashboard; establishment of the Inter-Provincial Task Force; functional coordination of International Health Regulations; and Global Health Security Agenda activities both at the federal and provincial levels. In addition to technical assistance, USAID funding will also be used to procure office equipment, furniture, and to pay for travel and meeting-related costs. Through a G2G support mechanism, the HPSIU will be able to initiate sustainable strategic reforms in the health sector to bridge the universal health coverage gap, formulate policies to alleviate programmatic implementation challenges, and guide evidence-based decision making processes.

3.6 Direct Support to the Health Services Academy (HSA) Activity will support the Health Services Academy (HSA) of Pakistan's efforts to become an accredited university of public health, and a premier technical training center for public health professionals. In particular, funding will be directed at creating and strengthening existing career tracks in maternal and child health, family planning, monitoring and evaluation, and behavior change communication. Support will also enable HSA to develop a business plan, implement a faculty development initiative to strength their skills in health systems, particularly policy research and development. The research will be non-medical, such as policy research, assessments, and surveys. Key activities include technical assistance for organizational

assessments and reforms; faculty training; establishment of new public health tracks such as Behavior Change Communication, and Epidemiology. In addition to technical assistance, USAID funding will be used to procure office equipment, furniture, and pay for travel and meeting-related costs.

3.7 Direct Support to the Sindh Department of Health (DOH) Activity will improve the functional capacity of Sindh's DOH's Monitoring and Evaluation (M&E) Unit to better inform strategic planning and resource allocation, improve quality of services, increase coverage, improve policy formulation and strengthen disease surveillance. Support to this unit will enable the DOH to strengthen data and monitoring systems to improve the quality and use of health information. Activities include technical assistance to establish a cadre of qualified local M&E experts; streamline and strengthen operating procedures for the M&E, and Planning and Development units to raise them to the level of directorates; and carry out organizational strengthening activities to improve program planning, budgeting and implementation capacity at the DOH. USAID funding will also be used for short- and long-term public health and management courses for mid-level and senior health managers. In addition to technical assistance and training, USAID will fund office renovation and refurbishment. The office renovation will be non-structural in nature.

3.8 The Integrated Service Delivery Initiative (ISDI) is a planned three-year cooperative agreement that will provide service delivery support to local provinces for family planning, maternal and child health, and nutrition. The objective of this activity is to further strengthen the service delivery capacity of public and private sector providers, including the introduction and scale-up of high-impact cost-effective interventions to accelerate progress towards decreasing maternal and child mortality rates. Linkages will also be made to increase demand for quality services in rural and impoverished communities. Activities include training for private sector providers on the latest medical and community health standards and procedures for Maternal & Child Health and Family Planning; technical assistance to public and private sector providers on quality assurance, behavior change communication, supervision and mentoring; technical assistance to federal and provincial governments on implementation science, ensuring provincial governments can translate research into implementation across large geographic areas. In addition to technical assistance through the provision of consults or training, USAID will fund procurement of minor medical equipment and office furniture.

3.9 Health Systems Strengthening (HSS) II Activity will be a follow-on to the HSS activity that ends in April 2018. The HSS II award is anticipated to be a three-year cooperative agreement that will continue to provide technical assistance support to the Federal Ministry of National Health Services, Regulations, and Coordination (MNHSRC), and the Sindh Ministry of Health to streamline and strengthen health systems with the devolution of authority to provincial governments. The objective of this activity will be to provide targeted support to move forward key initiatives under health financing, human capacity development, governance, and health policy to improve the efficiency and effectiveness of the public health system. This activity will also provide technical support to MNHSRC, the Health Services Academy, and Sindh Department of Health to meet the objectives set out under revised G2G mechanisms being developed by OHPN. The environmental lessons learned from the first phase of this activity are covered in the lessons learned section below.

3.10 Budget

A list of the new activities and their illustrative costs are provided in Table 1. The total of \$91.8 million does not add new money to the MCH Project, but realigns the existing budget and, therefore, does not increase the LOP funding of \$580 million in the original IEE, as amended.

Table 1: MCH Project Illustrative Budget for New Activities

New Activity Name	LOP US\$ (M)
The Family Planning Training Activity	5.5
Enhancing Private Sector Support	3.0
Direct Support to the Ministry of National Health Services, Regulations and Coordination Activity	3.1
Direct Support to the Health Services Academy (HSA) Activity	3.1
Direct Support to the Sindh Department of Health (DOH)	2.0
Design of Mission G2G Activity	0.2
Water, Sanitation and Hygiene Activity	24.0
The Integrated Service Delivery Initiative (ISDI)	40.9
Health Systems Strengthening II (HSSII) Activity	10.0
Total	91.8

3.11 Environmental Compliance Lessons Learned

Over the past four years, OHPN complied with all conditions set in the original IEE, MCHP IEE (Asia 10-02 Pakistan IEE-ETD Health Program) and its eight amendments. No pesticides were procured. In one incident, the implementing partner procured x-ray machines without obtaining approval from the Assistance Officer's Representative (AOR) or Mission Environmental Officer (MEO). The purchase of hospital diagnostic equipment was, however, approved in the original IEE (Asia 10-02 Pakistan IEE-ETD Health Program). It received a Negative Determination with Conditions, but the requirement for an Environment Documentation Form or Environmental Monitoring and Mitigation Plan (EDF/EMMP) was not specified in the IEE. There is no evidence that the contractor did not follow the proper guidelines and policy in ADS 312 for Eligible Commodities. Prior approval and oversight monitoring by the AOR and MEO for purchase and installation of the equipment, and training for local staff in its use and maintenance could have been improved. The X-ray machines are now installed and are being operated by trained staff in accordance with applicable procedures.

Reporting by GOP and local non-government implementing partners was not always timely or comprehensive as this was the first time that many of them were implementing USAID activities. They received awareness training by the Regional Environmental Officer on the importance of monitoring and evaluation, and compliance with the terms and conditions of the IEE. As a follow-up, the AOR has conducted field visits to review and discuss environmental compliance.

Since the start of the MCH Project, the OHPN learned that site-specific EDF/EMMPs prior to service delivery implementation are critical in fine-tuning IEE threshold decisions. For new activities, OHPN will ensure that all work plan activities include site-specific EDF/EMMPs and that the IEE terms and conditions are a critical part of the activity approval process. EMMPs have now been prepared for those activities for which they were missing. The environmental compliance training of implementing partners in Bangkok in August 2015 was helpful in that regard. Another lesson learned is the importance of providing a comprehensive overview and training on environmental compliance per the terms and conditions of the IEE to local partners and government counterparts. Local partners that were new to USAID appreciated the training offered in Bangkok in 2015 on USAID environmental policies and procedures, IEE, EDF and EMMP preparation, and compliance procedures. As a result, GOP

counterparts better understood the importance that the USG places on environmental compliance, the process of assessing the potential effects of activities on the natural and physical environment, and the preparation of EMMPs. GOP counterparts are doing a better job of integrating improved environmental practices into their operational plans. This effort is supported by the AOR and MEO through review of project reports, site visits and training.

4.0 COUNTRY CLIMATE CHANGE INFORMATION (BASELINE INFORMATION)¹

Pakistan has 11 climate zones due to its range of topographies and ecosystems, and each of these experiences different weather and climate patterns. Generally, the coastal areas of the country are dry and hot and the northern uplands get progressively cooler. The winter months, from December through February, are cool and dry. The country experiences monsoons from June through September, with a lesser degree of monsoon activity in October and November.

Temperature: Widespread changes in extreme temperatures have been observed in Pakistan over the last 50 years. Cold or frosty days and nights have become less frequent whereas hot days and nights, and heat waves have become more frequent. According to Pakistan's Task Force on Climate Change, temperature is projected to increase from the 1960-1999 baseline by 1.3°C by 2020, 2.5°C by 2050, and 4.4°C by 2080 under one scenario. Under another scenario, temperatures in Pakistan are projected to rise by 1.45°C, 2.75°C and 3.87°C in 2020, 2050, and 2080, respectively.

Precipitation: Average rainfall in the arid and coastal plains of Pakistan has decreased by between 10 and 15 percent since 1960, while increasing during the same time period over northern Pakistan. Heavy rainfall events have increased, with the nine heaviest rains recorded in 24 hours all being registered in 2010.

Sea Level Rise: The low-lying plains along the coast of Pakistan are exposed to the impacts of sea level rise, with conservative scenarios projecting an increase of 40 cm by 2100.

Extreme Events: Pakistan has experienced about 18 extreme weather events since 1990, including the historic 2010 floods, as well as droughts, cyclones, and landslides. Due to the heavy monsoon rains during the summer months, Pakistan often experiences severe flooding in the Indus River basin where much of the population lives on low-lying lands. Rain or otherwise- triggered landslides are common in the northern regions of Pakistan, particularly those connected to Azad Jammu Kashmir province. Lowland plains, especially those surrounding the urban areas of Karachi and Hyderabad, are vulnerable to the impacts of cyclones and storm surge. Finally, sparse and erratic rainfall patterns can alter water tables, leading to drought conditions in the southern and central regions of Pakistan.

5. COUNTRY ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

Studies conducted by the GOP, USG and donor agencies^{2,3,4, 5,6,7} in Pakistan have highlighted a number of environmental issues. Broadly, the areas of concern identified include uncertainty and climate

¹ **Pakistan Climate Vulnerability Profile** available at: <https://www.climatelinks.org/resources/pakistan-climate-vulnerability-profile>

² **Pakistan Proposed World Bank Climate Change and Environment Program 2010-2015** World Bank Report No. 69561-PK at: http://www-wds.worldbank.org/external/default/WDSPContentServer/WDSP/IB/2012/06/14/000425970_20120614132008/Rendered/PDF/695610ESWOP10500change0E0VJune02010.pdf

³ **Pakistan: Country Development Landscape** World Bank Report No. 91700-PK at: http://www-wds.worldbank.org/external/default/WDSPContentServer/WDSP/IB/2014/10/27/000469252_20141027124747/Rendered/PDF/917000WP0WBOPK00Box385342B00PUBLIC0.pdf

variability in the design and operation of water resources projects, potential climate impacts and stress points on the energy sector, water availability for energy and food, climate change impacts on the energy sector, Indus River Basin flood management, energy, pollution, waste management, irrigated agriculture, and biodiversity. Furthermore, accelerated growth and urbanization present additional environmental challenges, such as toxic air and water pollution, and hazardous solid waste. In order to maximize growth, the country needs complementary policies that address environmental issues while facilitating development. Conservative estimates presented in a World Bank report suggest that environmental degradation costs the country at least 6 percent of GDP, and these costs fall disproportionately upon the poor⁸. The increasing pollution of water, air, and land continues to have an enormous impact on people's health: illness and premature mortality caused by air pollution (indoor and outdoor), diarrheal diseases, and typhoid due to inadequate water supply, and sanitation and hygiene. These conditions affect largely on vulnerable groups, such as children.

Given its range of latitude and immense variations in altitude, Pakistan spans a number of the world's ecological regions that encompass a variety of habitats supporting rich biodiversity. However, several animal and plant species are currently threatened and/or endangered, largely as a result of overexploitation and loss of natural habitat, exacerbated by pressures stemming from rapid population growth, persistent poverty, and climate change impacts. The country's forest cover has declined steadily, from 2.3% of total land area in 2008 to 2.1% in 2011, due largely to logging, agricultural clearing, and fuelwood harvesting.⁹

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

Pakistan has a commendable record of efforts to promote conservation and longer term sustainability, from the National Conservation Strategy of 1992 through to the adoption of a National Environment Policy (NEP) in 2005.

⁴ **Pakistan: Country Snapshot** World Bank Report No. 100119-PK at: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/T MNA/2015/10/11/090224b083138fb7/1_0/Rendered/PDF/Pakistan000Country0snapshot.pdf

⁵ **Cleaning Pakistan's Air** World Bank Report No. 89065-PK at: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/07/09/000442464_20140709123335/Rendered/PDF/890650PUB0Clea00Box385269B00PUBLIC0.pdf

⁶ **Development of Environmental Laws and Jurisprudence in Pakistan** ADB Report at: <http://www.adb.org/sites/default/files/publication/31140/environmental-law-jurisprudence-pakistan.pdf>

⁷ **Indus Basin Floods** ADB Report at: <http://www.adb.org/sites/default/files/publication/30431/indus-basin-floods.pdf>

⁸ **Pakistan Proposed World Bank Climate Change and Environment Program 2010-2015** World Bank Report No. 69561-PK at: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2012/06/14/000425970_20120614132008/Rendered/PDF/695610ESWOP10500change0ENVJune02010.pdf

⁹ **Country Partnership Strategy: Pakistan, 2015–2019** ADB Report at: <http://www.adb.org/sites/default/files/linked-documents/cps-pak-2015-2019-ena.pdf>

6.0 LEGISLATIVE AND REGULATORY FRAMEWORK

6.1 National Environmental Policies and Legislation¹⁰

6.1.1 Pakistan Environmental Protection Act 1997¹¹

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

6.1.2 Pakistan IEE/Environmental Impact Assessment (EIA) Regulation, 2000^{12 13}

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

6.1.3 National Environmental Quality Standards (NEQS) 2000¹⁴

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

6.1.4 Occupational Health and Safety (OHS) Standards

The main law governing OHS in Pakistan is the Factories Act of 1934. The Hazardous Occupation Rules of 1978 designate certain occupations as hazardous and contain special provisions to regulate working conditions in these occupations. Additionally, other laws dealing with OHS include: The Mines Act (1923), Social Security Ordinance (1965), Workmen's Compensation Act (1923), Shop and Establishment Ordinance (1969), and the Dock Laborer Act (1934). Additionally, the Hazardous Substances Rules (2003) cover worker safety and the use of hazardous substances in the workplace.

6.1.5. Building Codes / Seismic Standards

Pakistan is one of the most seismically active countries in the world. Following the devastating October 2005 earthquake, on August 26, 2007, the new Pakistan Building Code went into effect throughout the country¹⁵. All structures, new buildings, including residential, industrial, and commercial, particularly high-rise buildings, are required to follow the requirements of the Code, in particular with regard to its seismic provisions.

6.1.6. Local Government Ordinance, 2001

This Act empowers the GOP and provincial governments to enforce laws for land use, conservation of natural vegetation, air, water, and land pollution, disposal of solid waste and wastewater effluent, and public health and safety, including some provisions for environmental protection. Section 93 of this

¹⁰ <http://www.environment.gov.pk/> and <http://www.lexadin.nl/wlg/legis/nofr/oeur/lxwepak.htm>

¹¹ <http://www.environment.gov.pk/act-rules/Brief-PEPA-Act1997.pdf>

¹² <http://www.environment.gov.pk/act-rules/IEE-EIA-REG.pdf>

¹³ <http://environment.gov.pk/> with links to provincial offices with environment responsibilities

¹⁴ <http://www.environment.gov.pk/NEQS/SRO549%20I2000-NEQS.pdf> covers liquid industrial effluents

¹⁵ The new building code replaced the 1986 Pakistan Building Code, which was never formally adopted by as a government regulation.

Ordinance pertains to environmental pollution under which the local councils are authorized to restrict activities causing pollution to air, water, or land.

6.2. Provincial Environmental Policies and Legislation

6.2.1 Punjab Province

6.2.1.1 Punjab Environmental Protection Act, 2012

The Punjab Environmental Protection Act, 1997 (amended 2012) is the basic legislative tool at the provincial level after the devolution of power in the 18th amendment to the Pakistan Constitution, empowering provincial governments to frame regulations for the protection of the environment. The act is similar in nature to the Pakistan Environmental Protection Act and refers to the Pakistan Environmental Protection Agency Review of IEE and EIA regulations as the primary guideline for preparation of environmental safeguards instruments. The regulatory powers and implementation responsibilities are now designated in the province to the Punjab Environmental Protection Department (EPD). Punjab EPD is also required to ensure compliance with the National Environmental Quality Standards (NEQS) and establish monitoring and evaluation systems.

6.2.1.2 Punjab Wildlife (Protection, Preservation, Conservation and Management) Act, 1974

This law was enacted to protect the province's wildlife resources directly and other natural resources indirectly. It classifies wildlife by degree of protection, i.e., animals that may be hunted on a permit or special license, and species that are protected and cannot be hunted under any circumstances. The Act specifies restrictions on hunting and trade in animals, trophies, or meat. The Act also defines various categories of wildlife protected areas, i.e., National Parks, Wildlife Sanctuaries, and Game Reserves.

6.2.2 Sindh Province

6.2.2.1 The Sindh Environmental Protection Act 2014

After passage of the 18th Amendment to the Pakistan Constitution, the Sindh Government enacted its own environmental law. The Sindh Environmental Protection Bill, 2014 was signed by the Governor of Sindh on March 19, 2014 as an Act of Legislature of Sindh.

6.2.2.2 Sindh Wildlife Protection Ordinance, 1972 and Amendments 2001

This ordinance provides for the preservation, protection, and conservation of wildlife by the formation and management of protected areas and prohibition of hunting of wildlife species declared protected under the ordinance. The ordinance also specifies three broad classifications of the protected areas: national parks, wildlife sanctuaries, and game reserves.

6.2.3 Khyber Pakhtunkhwa Province (KPK)

6.2.3.1 The KPK Environmental Protection Act, 2014

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

6.2.3.2 KPK Wildlife and Biodiversity (Protection, Preservation, Conservation and Management) (Amendment) Act, 2015

KPK Wildlife and Biodiversity (Protection, Preservation, Conservation and Management) Act, 2015 provides legislation for wildlife and biodiversity protection in the KPK province. The Act makes provision for the declaration of Wildlife Sanctuaries and Game Reserves, and for the restriction of hunting in protected areas.

6.2.4 Balochistan Province

6.2.4.1 Balochistan Environmental Protection Act, 2012

Balochistan Environmental Protection Act of 2012 provides the overarching provincial framework for the protection of the environment in Balochistan. It builds on the provisions of PEPA and localizes them to the provincial context.

6.2.4.2 Balochistan Environmental Protection Agency

Balochistan Environmental Protection Agency (BEPA) is a department headed by the Secretary of Environment and Sports. It is the sole environmental regulatory body for Balochistan Province, responsible for implementing National and provincial laws, improving the protection of environmental and natural resources of the Province, while developing policies for improvement and sustainable use of natural resources.

6.2.4.3 EIA Approval Procedure in Balochistan

The Balochistan Act has further devolved the power at district/regional level and allows for district agencies along with a provincial EPA (Para 8 of the Act). The BEPA is vested with the authority of reviewing IEE/EIAs in line with the institutional administrative structure.

6.2.4.4 Balochistan Wildlife Protection, Preservation, Conservation and Management Act, 2014

This legislation is guided primarily by the principle of ensuring the protection, preservation, promotion, conservation, management and sustainable development of wild animals in recognition of their position as key components of biological diversity with social, cultural, economic and ecological significance for the present and future generations.

6.2.4.5 Balochistan Culture Heritage Preservation Act, 2010

This Act empowers the Provincial Government to protect cultural heritage in the province. It empowers the government to compulsorily acquire any heritage that could be lost to various threats. It states punitive action for the wilful destruction of protected cultural heritage.

6.2.5 Gilgit Baltistan Region

6.2.5.1 Gilgit Baltistan Environmental Protection Agency

Gilgit-Baltistan Environmental Protection Agency (GB-EPA) was established under section (8) of PEPA, 1997. The GB-EPA may undertake inquiries or investigation into environmental issues, either of its own accord or upon complaint from any person or organization. GB-EPA also provides the framework for implementation of a National Environmental Policy and National Sanitation Policy; establishment of Provincial Sustainable Development Funds; protection and conservation of species; conservation of renewable resources; establishment of Environmental Tribunals; and appointment of Environmental Magistrates.

6.2.6 Azad Jammu & Kashmir (AJK)

6.2.6.1 AJK Environmental Protection Act, 2000

An Environmental Unit (EU) was established in Planning & Development Department of AJK in 1994 to carry out the environmental assessments of public sector initiatives. The EU was later upgraded to AJK Environmental Protection Agency (EPA) in 1997 under AJK Environmental Protection Act of 1996. The AJK Environmental Protection Act of 1996 was further amended and enacted as AJK Environmental Protection Act in 2000, empowering the regulatory body to formulate policies, develop interdepartmental coordination and establish NEQS with the Council's approval.

6.2.6.2 The Jammu and Kashmir Forest Regulations, 1930

The main legislation for management and protection of forest and rangeland in AJK is the Jammu and Kashmir Forest Regulation of 1930 and its later amendments of 1973, 1976, 1977 and 1980. The amendments are mostly related to penal provisions for forest offences. According to the AJK Forest Regulations, the forests are designated as 'Demarcated' or 'Un-demarcated'. The former, are under the control of Forest Department, while the latter are under the control of the Board of Revenue through the Deputy Commissioner. There are two other categories of forests in AJK denominated as "Village Forests" and "Private Forests". The former are established under Section 14 (a) of the AJK Forest Regulations, while the latter are established under the Private Forest Rules of AJK Land Revenue Act 1955. Moreover, the "Tree Plantation & Maintenance Act 1977 has been enacted to ensure planting and maintenance of at least 3 trees per acre in farmland. Under the provision of the forest related legislations there are regulations on usufruct right of the communities or individuals for using the area for grazing, acquiring wood for fuel wood or timber. However, for cutting trees for the construction of a project, special permission would be needed from the Forest Department and Revenue Department/Local Administration depending upon the type of forest encountered.

6.2.6.3 The AJK Wildlife (Protection, Preservation, Conservation and Management) Act, 1975

In addition to empowering AJK wildlife department to establish game reserves, parks, and wildlife sanctuaries, this Act regulates the hunting and disturbance of wildlife. Where proposed projects may have an impact on wildlife, the AJK-EPA requires the proponent to coordinate with the AJK wildlife department for the implementation of the project, and monitor activities during construction and operation of the project.

6.3 International Environmental Treaties Ratified by Pakistan

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

1. Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)
Pakistan Ratified: 1976
2. Ramsar Convention on Wetlands. Pakistan Ratified: 1976
3. Convention on the Conservation of Migratory Species of Wild Animals (CMS). Pakistan Ratified: 1987
4. Vienna Convention on protection of ozone layer; and Montreal Protocol on ozone layer depleting substances. Pakistan Ratified: 1992
5. UN Convention on Biological Diversity (UNCBD). Pakistan Ratified: 1994.
6. Nagoya Protocol on Access and Benefit Sharing (ABS) under the convention on Biological Diversity (UNCBD).
7. UN Convention to Combat Desertification (UNCCD). Pakistan Ratified: 1997
8. Kyoto Protocol to United Nation Framework Convention on Climate Change (UNFCCC). Pakistan Ratified: 2005
9. Rotterdam Convention on the Prior Informed Consent (PIC) Procedure for Certain Hazardous Chemicals and Pesticides in International Trade. Pakistan Ratified: 2005
10. Stockholm Convention on Persistent Organic Pollutants (POPs). Pakistan Ratified: 2008

11. Cartagena Protocol on Bio-Safety (CPB). Pakistan Ratified: 2009
12. United Nations Framework Convention on Climate Change, Paris Agreement – signed April 22, 2016
13. International Treaty on Plant Genetic Resources for Food and Agriculture -2001 Pakistan Accession - 02 September 2003
14. International Plant Protection Convention – 1952. Pakistan Ratified - 10 November 1954
15. Plant protection Agreement for the Asia and the Pacific Region – 1956. Pakistan Adherence - 08 January 1958
16. Declaration on Control and Prevention of Air Pollution and its Likely Trans-boundary Effects for South Asia. Pakistan Endorsed - April 1998
17. The World Organization for Animal Health (OIE) - international Agreement signed on January 25th 1924 for Animal Health.
18. World Trade Organization (WTO) Agriculture Agreement - Agreement on Sanitary and Phytosanitary Measures
 - a. Uruguay Round Agreements
 - b. Doha Round Agreements
19. Forced Labor Convention, 1930 (No. 29), Ratified on 23 December 1957
20. Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87), Ratified on 14 February 1951
21. Right to Organize and Collective Bargaining Convention, 1949 (No. 98), Ratified on 26 May 1952
22. Equal Remuneration Convention, 1951 (No. 100), Ratified on 11 October 2001
23. Abolition of Forced Labor Convention, 1957 (No. 105), Ratified on 15 February 1960
24. Discrimination (Employment and Occupation) Convention, 1958 (No. 111), Ratified on 24 January 1961
25. Minimum Age Convention, 1973 (No. 138), Minimum age specified: 14 years, Ratified on 6 July 2006
26. Worst Forms of Child Labor Convention, 1999 (No. 182), Ratified on 11 October 2001
27. Labor Inspection Convention, 1947 (No. 81), Ratified on 10 October 1953
28. Tripartite Consultation (International Labor Standards) Convention, 1976 (No. 144), Ratified on 25 October 1994
29. WHO Framework Convention on Tobacco Control, Ratified on November 03, 2004
30. Geneva Protocol on Asphyxiating or Poisonous Gases, and of Bacteriological Methods, 1925, Ratified on 15 April 1960
31. Convention on the Prohibition of Biological Weapons, 1972, Ratified on 3 October 1974
32. Convention prohibiting Chemical Weapons, 1993, Ratified on 28 October 1997
33. Protocol on Blinding Laser Weapons (Protocol IV to the 1980 Convention), 13 October 1995 Ratified on 05.12.2000
34. Convention prohibiting environmental modification techniques (ENMOD), 1976, Ratified on 27 February 1986

6.4 USAID Climate Risk Screening Requirements

Presidential Executive Order 13677, dated September 23, 2014, "Climate-Resilient International Development" <http://www.whitehouse.gov/the-press-office/2014/09/23/executive-order-climate-resilient-international-development>, requires agencies engaged in international development to assess and evaluate climate-related risks and vulnerabilities and to adjust strategies, planning, programs, projects, investments, and overseas facilities, as appropriate, based on those assessments and evaluations. Emanating from this, USAID Agency Notice, Issuance of New ADS Mandatory Reference on Climate Change in USAID Strategies, dated October 9, 2015, notified the requirement for climate risk screening of all new USAID strategies, effective October 1, 2015, and for all new projects and activities, effective October 1, 2016. The requirement for climate risk screening at the strategy level is now formalized in the revised ADS 201, dated 9/7/2016. The Mandatory Reference for ADS Chapter 201, Climate Risk Management for USAID Projects and Activities, dated October 12, 2016, mandates climate risk assessments at the project and activity levels, outlines the process and provides tools for so doing.

7.0 PROJECT ACTIVITIES AND RECOMMENDED CLIMATE RISK MANAGEMENT ACTIONS (INCLUDING MONITORING AND EVALUATION):

The Project design team used "USAID's Climate Risk Screening Tool" (Mandatory Reference for ADS Chapter 201, dated 10/12/16) to assess the potential climate risks for the project. The tool is essentially a matrix that systematically identifies the relevant sectors, regions, and timeframes for analysis, and assesses the potential climate change impacts, adaptive capacity and potential options to address those impacts.

Project activities will focus on Sindh, Khyber Pakhtunkhwa (KP), Federally Administered Tribal Areas (FATA), Azad Jammu Kashmir (AJK), and Gilgit Baltistan (GB), but will be implemented in any area of Pakistan determined to be able to achieve the greatest impact.

This climate risk screening considered the potential impacts of: climate (temperature, drought, precipitation and flooding, sea level rise and storm surge, and winds and other storms), across the geographical scope, over a ten-year time frame for various activity components. The timeframe was limited to ten years as the activity is only providing technical assistance and training over five years with perhaps another five-year sphere of influence.

The WHO has identified a number of specific health risks in Pakistan due to climate change¹⁶. The organization projects that by 2030, an additional 1.5 million people in Pakistan may be at risk of river floods annually as a result of climate change. Indirect health effects from excessive flooding include the spread of infectious disease outbreak, and vector distribution. Climate conditions such as temperature, precipitation and humidity are projected to become significantly more favorable for transmission of infectious diseases, slowing progress in containing diseases, and increasing the populations at risk if control measures are not maintained or strengthened. Climate-related increases in mean annual temperature and the intensity and frequency of heat waves put a greater number of people at risk of heat-related medical conditions that can even result in mortality. The elderly, children, and the chronically ill are among the more vulnerable to heat-related conditions. Another indirect impact of climate change, through higher temperatures, land and water scarcity, flooding and drought, on health is the lowering of food production, and increasing food insecurity. In Pakistan, the prevalence of stunting in children

¹⁶ Climate and Health Country Profile-Pakistan, WHO 2015

under age 5 was 45% in 2013. The prevalence of underweight children and wasting in children under age 5 was 31.6% and 10.5%, respectively in 2013.

As the MCH Project amendment includes nine new activities, rather than screen them separately, common themes or components across the activities were identified. The common components included technical assistance and training, institutional capacity development, behavior change communication, social awareness and marketing, and policy research and implementation. One activity, covering water, sanitation and hygiene, was treated separately.

There is no investment in construction or other infrastructure, although some funds are allocated towards non-structural refurbishment of buildings.

Specific questions related to climate risk for the health, and water supply and sanitation sectors, per Agency Climate Change Risk Screening Tool – Facilitator’s Note, updated June 2016, were raised with regard to the activity components. Questions pertaining to the opportunities for creating awareness and preparing for adaptation were particularly germane.

The climate risk screening concluded that there were no potential climate impacts on many of the activity components, hence, their risk ratings are low. These included technical assistance and training, behavior change communication, social awareness and marketing, and policy research and implementation. Although no adaptation measures are necessary, these activity components do offer opportunities to incorporate climate change adaptation language in policies, develop climate change adaptation plans, and clarify roles and responsibilities for implementation.

Two activity components, institutional capacity development, and management capacity for water, sanitation and hygiene caused a dilemma for the reviewer because, whereas the Project is providing only technical assistance, the potential climate impact on health, for the areas in which the technical assistance is being provided, could be considerable with poor management and weak adaptive capacity. These were, therefore, rated as moderate risk.

Institutional Capacity: Much of the technical support is being provided to strengthen the capacity of provincial governments for the management and administration of health services, improve information systems and data management in the health sector, conduct assessments, and upgrade monitoring systems. These activities could be rated as low risk. The dilemma occurs because some technical and institutional support is being provided to manage health service delivery, including the scaling up of interventions to reduce maternal and child mortality, and scale up diarrhea treatments. It is known¹⁷ that women and children are among the most vulnerable to the effects of climate change. For example, maternal malaria could lead to abortion, and still births¹⁸. Increases in temperature and reduced water supply have been shown to increase the incidence of diarrhea and increase mortality among children under 15 years¹⁹. These health risks, exacerbated by the fact that the adaptive capacity, in terms of institutional, information management, human and financial capacity, within the health service sector in Pakistan is low, led to a moderate risk determination for this activity component.

Water and Sanitation and Hygiene: It is well documented^{20 21} that the potential impacts of poor water and sanitation regimes can have devastating impacts on health. Contamination of drinking water from

¹⁷ Protecting Health from Climate Change, WHO 2009

¹⁸ Gender Climate Change and Health, WHO, 2014

¹⁹ Quantitative Risk Assessment of the Effects of Climate Change on Selected Causes of Death, 2030s and 2050s, WHO 2014

²⁰ Adaptation to Climate Change in Water, Sanitation and Hygiene, Naomi Oates, 2014

²¹ Connecting Water, Sanitation Hygiene with Fresh Water Conservation and Climate Resilience, NRDC 2014

flooding can increase the incidence of cholera and other water-borne diseases²². In addition, sanitation infrastructure can be severely compromised as a result of climate change impacts such as flooding or sea-level rise²³. Although this activity is helping to improve institutional capacity, the innate human, financial and institutional capacity of the provincial governments and private sector partners in the water-sanitation sector is weak. For these reasons, this activity component was rated as moderate risk although the activity is providing only technical assistance.

The MCH Project does not anticipate any construction activities. Should construction later be considered, climate risk screening shall be conducted at the activity level in conjunction with the IEE for review and approval by A/COR, MEO and Climate Integration Lead (CIL), along with related documents, like the EDF/EMMP.

A summary of the conclusions from the analysis is presented in Table 2.

Table 2: MCH Project activities with Climate Risk Screening Summary

Illustrative Interventions	Risks	Risk Rating	How Risks Addressed /Accepted	Opportunities to Strengthen Climate Resilience
Technical Assistance and Training	None	Low	Not Applicable	Provides an opportunity to educate public officials, and faculty on the risks posed to the health sector by climate change and examine adaptation measures. This can be incorporated into curricula of new courses.
Behavior Change Communication	None	Low	Not Applicable	Improve public education and outreach efforts. Promote behavior change with respect to water purification, and household sanitation to reduce health risks.
Social Awareness and Marketing	None	Low	Not Applicable	Opportunity to increase the awareness of students, parents, and community organizations on the impacts of climate change, and begin to socialize coping mechanisms.

²² WASH Climate Resilient Development, UNICEF 2014

²³ Handbook on Climate Change and Disaster Resilient Water, Sanitation and Hygiene Practices, WaterAid 2012

Policy Research and Implementation	None	Low	Not Applicable	Incorporate climate change adaptation language as appropriate in the policy documents. Develop climate change adaptation plans and clarify roles and responsibilities for implementation.
Institutional Capacity Development (strengthen health service delivery; scale up interventions to decrease maternal and child mortality; and scale up diarrhea treatment)	High temperature may compromise maternal health, and increase the incidence of diarrhea. Increased flooding incidents may contaminate drinking water and increase the incidence of certain diseases such as cholera.	Moderate	Improve data monitoring and data management in health services; train health administrators to develop and implement climate adaptation plans	Opportunity to develop partnerships between public and private sectors to improve climate adaptation measures in the sector. Opportunity to work cross-sectorally to address climate adaptation in sector.
Water, Sanitation and Hygiene (strengthen institutional capacity, policy reforms, scale up good sanitation practices)	Climate change may affect the capacity and operations of existing water and sanitation infrastructure and services. These services have to prepare for the widely anticipated consequences of floods and droughts, and risk compromising access to safe drinking water and adequate sanitation for substantial numbers of people in Pakistan. This may have a potential impact on human health and development.	Moderate	Identify human and institutional capacity needs for climate adaptation planning and implementation; and conduct assessments to identify vulnerable areas and populations to climate risks; identify policy and institutional gaps for integrating climate adaptation in water, sanitation and hygiene activities.	Opportunity to incorporate climate change adaptation in policies, and implementation planning; and in the design, and constructing of new systems or scaling up existing models

8.0 Threshold Determinations:

This IEE amendment satisfies the conditions of the environmental procedures for activities and delegation of environmental review responsibility to the Mission. Except for the new activities described in Section – 3.0 above, the recommended threshold decision for the existing activities in the

original IEE; Asia 10-02 Pakistan IEE-ETD, and its Amendments 1 to 8, remains unchanged. The Environmental Threshold Determinations for the new activities under the Project are below.

8.1 Activities with Approved IEEs:

Three activities have existing IEEs by virtue of being buy-ins to USAID/Washington contracting mechanisms. The Water, Sanitation and Hygiene is an existing Mission activity with an approved IEE that is being subsumed under the Project. The scope and nature of all previously approved activities remain the same. All previously approved Threshold Decisions, conditions, limitations and stipulation for revision remain in force.

A list of these activities with their approved IEEs, threshold determinations, and LOP funding is presented in Table-3.

The life of project value for the sum of these activities is not to exceed \$32.7 million (36% of LOP amount for new activities).

Table 3. List of Activities with approved IEEs

Activities	IEE #	Date of Approval	Threshold Determination	LOP Amount (M)
The Family Planning Training Activity	GH-13-16	2/4/13	NDC	\$5.5
Enhancing Private Sector Support Activity	Not available	8/20/14	NDC	\$3.0
Design of Mission Government to Government (G2G) Activity	GH-16-15	9/8/16	CE	\$0.2
Water, Sanitation and Hygiene Activity	IEE OAPA-13-SEP-PAK-0023	9/4/13	CE	\$24.0
Total				\$32.7

8.2 Threshold determination for all other new activities:

8.2.1 Categorical Exclusion as per 22 CFR 216.2(c)(2)(i), (\$41.37 million / 45% of LOP amount for new activities)

It is recommended for all capacity building and technical assistance activities associated with the MCH Project. Implementation of such proposed actions do not have an effect on the natural or physical environment. *The life of project value for the sum of these activities is not to exceed \$41.37 million (45% of LOP amount for new activities).* Such activities may include the following:

- Project management and other such administrative activities;
- Technical assistance, capacity building or training activities [22CFR216.2(c)(2)(i)]
- Public awareness/communication/outreach campaigns, media campaigns, advocacy/information campaigns and public information campaigns
- Information and experience sharing sessions [22CFR216.2(c)(2)(iii)]
- Studies required to support activities of the project [22CFR216.2(c)(2)(iii)]
- Analyses, investigations, reviews, assessments, restructuring and business plans, planning, studies (feasibility, monitoring, impact evaluation, and other social/technical/engineering studies, etc.), surveys, mapping, workshops, seminars, conferences, meetings, enterprise resource planning, GIS mapping, policy and governance assistance [22CFR216.2(c)(2)(iii)];

- Preparation of environmental documentation including environmentally required studies. [22CFR216.2(c)(2)(iii)]
- Activities which have no potential environmental impacts, including those activities not requiring a BEO-OAPA approved EA according to USAID procedures or EIA according to Pakistan Environment Laws. The USAID environmental procedures are governing in this case.

8.2.2 Negative Determination with Conditions (NDC) per 22 CFR 216.3 (a)(2)(iii), (\$17.73 million / 19% of LOP amount for new activities)

A Negative Determination with Conditions is recommended for all other activities undertaken in the project that are not listed above for which a Categorical Exclusion is recommended. These activities may have potentially minor to moderate adverse impacts on the physical and natural environment. *The life of project value for the sum of these activities is not to exceed \$17.73 million/19% of LOP amount for new activities).*

The conditions being environmentally sound design, monitoring and evaluation (M&E), and best management practices to minimize impact on the environment during implementation and design life operation of the facility. Section 8.3 elaborates on conditions that could be applicable. The conditions will be refined for each NDC activity in an Environmental Documentation Form (EDF) and Environmental Mitigation and Monitoring Plan (EMMP) identifying potential adverse environmental risks and impacts, mitigation measures, monitoring and inspection schedule, and entities required to ensure compliance with the EMMP must be developed and approved by the Assistance/Contracting Officer Representative (A/COR) and Mission Environmental Officer (MEO)/Deputy MEO prior to commencement of the activity.

If the completed EDF indicates the potential for significant adverse environmental and social impacts, an Environmental Assessment (EA) process will be launched in consultation with the MEO/DMEO and with the concurrence of the Regional Environmental Advisor-OAPA (REA-OAPA). The process will follow the requirements of 22 CFR 216.6 and will involve: 1) developing a scope of work for Scoping to be reviewed and approved by the BEO/OAPA; 2) Scoping shall involve public consultation with potentially affected people and key relevant stakeholders, 3) Scoping Statement shall be reviewed and approved by the BEO/OAPA, 4) draft EA report shall be subject to: public consultation with potentially affected people and key relevant stakeholders, and review and approval by duly national and/or provincial environmental authority, 5) EA report shall be reviewed and approved by the BEO/OAPA; 6) findings and recommendations of the EA report with an EMMP shall be presented in an amendment to this IEE, duly reviewed and approved in the Mission and by the BEO/OAPA.

All grants, contracts, and cooperative agreements with implementing partners will include a requirement to follow all recommendations of this IEE. The implementing partners will be responsible for training their staff, grantees, subcontractors and counterparts on the contract/cooperative agreement's environmental requirements and for ensuring their compliance with these requirements.

This determination is recommended with the explicit commitment and understanding that ALL measures set out in this document constitute binding requirements and will be implemented in full.

8.3 Additional Conditions

8.3.1 Conditions Pertaining to Various Implementing Mechanisms

As the Project will be using a number of different implementing mechanisms, the following table (Table 4) provides guidelines on the application of U.S. Government environmental compliance regulations,

policies and procedures for these mechanisms.

Table 4: Guidelines on Applicable U.S. Government Environmental Compliance Policies and Regulations for Various Implementing Mechanisms

Implementing Mechanism	Name of Activity	Requirements	USAID References
Institutional contracts, cooperative agreements, grants	Family Planning Training; Integrated Service Delivery; Health Systems Strengthening II; Enhancing Private Sector Support; Design of Mission G2G Activity	Title 22 of the Code of Federal Regulations, Part 216 codifies USAID's environmental procedures (cited as 22 CFR 216) to ensure that environmental factors and values are integrated into the A.I.D. decision making process. ADS 204 provides policy directives and required procedures on how to apply Title 22 of the Code of Federal Regulations, Part 216 (22 CFR 216) to the USAID assistance process. ADS 201.3.4.5the Initial Environmental Examination (IEE) may be completed for all activities in a PAD, while in other cases the IEE determination may be deferred to the activity design process. The Mission or Washington OU must determine the appropriate timing for completing the IEE. In all cases, the Mission or Washington OU should consult closely with their MEO or BEO and must complete a threshold determination prior to award and prior to the implementation of the activity.	22 CFR 216 ADS 204, 22, ADS 201
Interagency Agreements		Per ADS 306.3.7.9.a, while the Recipient Agency must comply with all applicable law, such compliance would not necessarily include USAID's own, sometimes broad, implementation of statutes as reflected in its internal policies. Per ADS 306.3.7.9.a, , in cases involving a sensitive USAID policy, USAID may, if its wishes, review the Recipient Agency's description of the proposed activity to satisfy itself that the policy in question will not be violated. Per ADS 306.3.7.9.a, this type of policy review is not required, however, and such a policy review does not impose the USAID policy on the Recipient Agency or diminish the Recipient Agency's responsibility to comply with all applicable law. Per ADS 306.3.2.14 regarding FAA 632(a) agreements, and ADS 306.3.7.9.b, regarding FAA 632(b) agreements, the Recipient Agency is permitted to use its own procurement and administrative procedures in administering the transferred or allocated funds, but it may not be prudent for USAID to proceed with a transfer or allocation when USAID is on actual notice	22 CFR 216 ADS 306.3.7.9.a; ADS 306.3.7.9.b;

		that the Recipient Agency's procedures are inadequate for the proposed activity	
Government to Government	Direct Support to the Ministry of National Health Services, Regulations, and Coordination; Direct Support to the Health Services Academy; Direct Support to the Sindh Department of Health	Activities must be implemented in accordance with the requirements of ADS 220, and in compliance with 22 CFR 216 and ADS 204.	22 CFR 216, ADS 220, ADS 204
PIO Grants - Program Contribution	Water Sanitation and Hygiene	Per ADS 308.3.11(c), Program Contribution-type PIO grants not for the purpose of carrying out a specifically identifiable project or projects, as well as all general contributions, will normally be categorically excluded from environmental analysis under 22 CFR 216.2(c)(2)(vi).	22 CFR 216.2(c)(2)(vi) ADS 308, 308.3.11(c),
PIO Grants – Cost-Type Grants		Per ADS 308.3.11(c), in awarding Cost-type PIO grants to PIOs with their own environmental policies, for activities that are not exempt or categorically excluded from environmental analysis under 22 CFR 216, USAID should strive to rely upon the PIO's application of its own environmental policies to the activity proposed and include appropriate language in the PIO agreement.	22 FR 216 ADS 308.3.11(c),
GDA		USAID must make a due diligence investigation of the environmental record and practices of each partner in an alliance, and for the alliance as a whole. Where USAID resources are utilized under such structures (pooled resources), programs and activities are subject to environmental review under 22 CFR 216. The level of review depends on the proposed program or activity. To the extent that an alliance involves programs and activities that are not funded by USAID, 22 CFR 216 would not apply to activities financed separately by alliance partners utilizing their own funding mechanisms. For purposes of this discussion, due diligence means that, while the 22 CFR 216 environmental review procedures may not be applicable to a non-USAID funded parallel program or activity implemented under an alliance, USAID is still concerned about a proposed alliance partner's past record of environmental accountability and how it might affect the partner's specific plans under the alliance.	22 CFR 216, ADS 204.3.9

A summary of the threshold decisions for the new activities, not already covered by an approved IEE, are presented in Table 5.

Table 5. Recommended Threshold Decisions

Activities	Effects on natural or physical environment	Determination and Regulation 216 action required
Categorical Exclusion		
• Project / Program Management • Technical assistance, capacity building, advocacy, training programs except to the extent such programs include activities directly affecting the environment. • Financial, accounting, management and other capacity building	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
• Development of manuals and documents etc. • Studies required to support activities of the project/program • Analyses, investigations, reviews, assessments, restructuring and business plans, planning, studies (feasibility, monitoring, impact evaluation, and other social/technical studies, etc.), surveys, mapping, workshops, seminars, conferences, meetings, policy reforms, resource planning, policy and governance assistance	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(iii)
• Document and information transfer • Public awareness/communication/outreach campaigns, media campaigns, advocacy/information campaigns and Public information campaigns • Discussion panel(s) organized on television / radio and/or other conference and meetings • Public service announcements (PSAs) produced for print media, social media, television and radio	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(v)
Negative Determination with Conditions		
Provision of furniture, office equipment, laboratory equipment (e.g. thermometers, clamps, autoclaves), tools, machines, vehicles, computers; IT equipment,	Minor to moderate adverse effects on the	Negative Determination with Conditions per 22 CFR 216.3 (a)(2)(iii) The recipient will properly manage and dispose of equipment (tools, machines, vehicles, computers; IT

multimedia, laboratory, electronic etc.	natural or physical environment.	equipment, multimedia, laboratory, electronic etc.) when its useful life ends. All such equipment will be disposed of in an environmentally safe manner by a certified company in accordance with Pakistani laws, and in their absence, in accordance with international best practices acceptable to USAID. (Alternatively, when procuring equipment from a licensed provider/dealer an agreement may be reached that such equipment will be returned to the dealer for its environmentally safe disposal.) For procuring of electronic and miscellaneous equipment and furniture, the Implementers will adhere to USAID's general policies on commodity eligibility provided at http://www.usaid.gov/policy/ads/300/31251m.pdf and will not finance unsafe or ineffective products, such as certain pesticides, food products, or pharmaceuticals, and other commodities not eligible for financing under this policy. A/COR is required to review the equipment purchase to see that there is relevant discussion about disposal in the documents that accompany the equipment to the end user.
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Direct Support to the Ministry of National Health Services, Regulations and Coordination Activity (Implemented by Government of Pakistan's Ministry of National Health Services, Regulations and Coordination)

Develop key organizational and policy documents to streamline health planning and reform.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
Develop online integrated health information system.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
Maintain and update the Monitoring & Evaluation Dashboard.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
Establish the Inter-Provincial Task Force.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
Coordination of International Health Regulations and Global Health Security Agenda activities at the federal and provincial levels.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)

Direct Support to the Health Services Academy Activity (Implemented by Government of Pakistan's Health Services Academy)

Provide technical assistance for organizational assessments and reforms;	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
Faculty training and establishment of new public health tracks such as Behavior	No adverse effect on the natural or physical	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)

Change Communication, and Epidemiology.	environment.	
Direct Support to the Sindh Department of Health Activity (Implemented by Government of Sindh's Department of Health)		
Provide technical assistance to streamline and strengthen operating procedures for the Monitoring & Evaluation, and Planning and Development units.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
Provide short and long-term public health and management courses for mid-level and senior health managers.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
Carry out organizational strengthening activities in program planning, budgeting and implementation capacity at the Department of Health.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
Undertake minor non-structural renovation and refurbishment activities.	Minor to Moderate potential adverse impact on nature and physical environment	Negative Determination with Conditions per 22 CFR 216.3 (2)(iii). Conditions are that these activities have a site specific EDF with an EMMP submitted for the approval of the A/COR and MEO. Refer to Section 8.4 above for other conditions.
The Integrated Service Delivery Initiative		
Provide technical assistance to public and private sector providers to strengthen service delivery capacity, quality assurance behavior change communication, supervision and mentoring.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
Technical assistance to federal and provincial governments on implementation science, ensuring governments can translate research to implementation across large geographic areas.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
Scale-up of high-impact cost-effective interventions to accelerate progress towards decreasing maternal and child mortality rates.	Minor to moderate adverse effects on the natural or physical environment.	Negative Determination with Conditions per 22 CFR 216.3 (2)(iii) Conditions are that these activities have a site specific EDF with an EMMP submitted for the approval of the A/COR and MEO. Refer to Section 8.4 above for other conditions
Health Systems Strengthening (HSS) II Activity		
Provide technical assistance to strengthen health financing, human capacity development, governance, and health policy to improve the efficiency and effectiveness of the public health system.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(i)
Provide technical support to the Federal	No adverse effect on	Categorical Exclusion per 22 CFR

Ministry of National Health Services, Regulations, and Coordination, the Health Services Academy, and Sindh Department of Health to strengthen health service delivery.	the natural or physical environment.	216.2(c)(2)(i)
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9.0 USAID A/COR Responsibility

The AOR and activity managers of the MCHP are responsible to ensure that conditions set in the original IEE and its amendments are implemented, monitored, and as required reported. The conditions set in the Asia 10-02 Pakistan IEE-ETD and the Amendment No. 1; OAPA-11-NOV-PAK-0002, to Amendment No. 8; OAPA-15-MAY-PAK-0018, remains unchanged.

10.0 Implementing Partner Responsibility

This section of the original IEE; Asia 10-02 Pakistan IEE-ETD and the Amendment No. 1; OAPA-11-NOV-PAK-0002, to Amendment No. 8; OAPA-15-MAY-PAK-0018, remains unchanged.

11.0 Responsibility for Compliance

This section of the original IEE; Asia 10-02 Pakistan IEE-ETD and the Amendment No. 1; OAPA-11-NOV-PAK-0002, to Amendment No. 8; OAPA-15-MAY-PAK-0018, remains unchanged.

12.0 Conditions for Approval:

This section of original IEE; Asia 10-02 Pakistan IEE-ETD and the Amendment No. 1; OAPA-11-NOV-PAK-0002, to Amendment No. 8; OAPA-15-MAY-PAK-0018, is amended to include the additional conditions in this amendment.

13.0 Limitations of IEE:

This section of original IEE; Asia 10-02 Pakistan IEE-ETD and the Amendment No. 1; OAPA-11-NOV-PAK-0002, to Amendment No. 8; OAPA-15-MAY-PAK-0018, remains unchanged.

14.0 Revisions

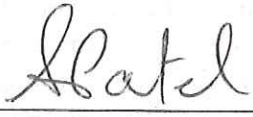
In accordance with 22 CFR 216.3(a)(9,) if a project is revised or new information becomes available, which indicates that a proposed action might be "major" and its effects "significant," the Determination will be reviewed and revised by the originator(s) of the program and projects and submitted through the MEO to the Bureau Environmental Officers, OAPA, for approval and, if warranted, an environmental assessment will be launched and scoping statement and environmental assessment report prepared. The scoping and EA process, if determined necessary during scoping, will follow and comply with 22 CFR 216.3(a)(4). It is the responsibility of the COR/PM to timely inform the MEO and BEO-OAPA of any changes in the scope and nature of approved activities, which may warrant the revision of the approved threshold decisions.

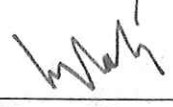
US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE), Amendment-9
Improved Maternal and Child Health Outcomes in Focus Areas

CLEARANCE / APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

CLEARANCE:

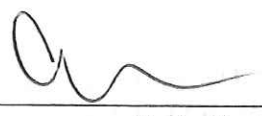
Activity Manager:  Date: 11/21/2016
Monica Villanueva

Office Director:  Date: 11/21/16
(Health, Population and Nutrition) Sangita Patel

Mission Environmental Officer:  Date: 11/21/2016
Howard Batson

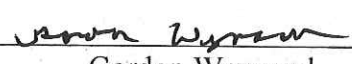
Regional Environmental Advisor: cleared in draft Date: email dated 11/17/16
(SCA & OAPA) Andrei Barannik

Office Director:  Date: 21 NOV 2016
(OPM) Robert Birkenes

~~Acting~~ Deputy Mission Director:  Date: 11-21-2016
Craig Buck

APPROVAL:
Mission Director: _____ Date: _____
John Groarke

CONCURRENCE:

Bureau Environmental Officer:  Date: 11/28/16
Gordon Weyand

Distribution: 1). Project files, 2). Mission IEE Data base, 3). OAA, 4). RLA



Howard Batson <hbatson@usaid.gov>

Pakistan: draft IEE Amendment 9 for Maternal and Child Health

Andrei Barannik <abarannik@usaid.gov>

Thu, Nov 17, 2016 at 7:58 PM

To: Howard Batson <hbatson@usaid.gov>

Cc: Monica Villanueva <mvillanueva@usaid.gov>, Naila Khalid <nkhalid@usaid.gov>, Asim Aziz <aaziz@usaid.gov>

Howard - reviewed - few comments are in the attached. With these addressed, pls have Amnd # 9 duly signed in the Mission, put "cleared by e-mail" on REA line and send it to Gordon Weynand, BEO/OAPA, cced Erin Laws, for his review and concurrence. W/r, Andrei

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