



USAID | PAKISTAN

FROM THE AMERICAN PEOPLE

US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE)
Women's Economic and Social Empowerment (Transform) Activity

in pre
2/11/2019

Project/Activity Data:

Activity/Project Title: Women's Economic and Social Empowerment (Transform) Activity		Solicitation #: N.A.
Contract/Award Number (if known):		
Geographic Location : Pakistan; 391		
Originating Bureau/Office: USAID Pakistan, Office of Stabilization and Governance		
Supplemental IEE: ☐ Yes ☒ No	DCN and date of Original document: N.A	
Amendment: ☐ Yes ☒ No	DCN and ECD link(s) of Amendment(s): N.A	
Programmatic IEE: ☐ Yes ☒ No	Amendment No.: N.A	
Funding Amount: \$20,000,000	Life of Project Amount: \$20,000,000	
Implementation Start/End: June 30, 2019 to June 29, 2023		
Prepared By: Amna Farasat	Date Prepared: January 29, 2019	
Expiration Date (if any): December 31, 2023	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: Climate Screening show LOW Risk, therefore not required.

US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE)
Women's Economic and Social Empowerment (Transform) Activity

SUMMARY OF FINDINGS:

1.0 Background and Project/Activity Description:

1.1 Purpose and Scope of IEE

The purpose of this analysis, in accordance with 22 CFR 216, is to provide a review of the reasonably foreseeable effects on the environment, as well as recommend Threshold Decisions as it pertains to USAID's new Women's Economic and Social Empowerment (Transform) Activity. This IEE provides a brief statement of the factual basis for a Threshold Decision as to whether an Environmental Assessment or an Environmental Impact Statement is required for Transform.

1.2 Background

Over the last several years, the Government of Pakistan has made strides toward achieving gender equality. It has promulgated pro-women legislation on harassment in the workplace, and quotas for women in the national, provincial, and local legislatures, and in public sector jobs. New legislation now covers the prevention of domestic violence, women's access to inheritance, protection against early marriage, prevention of acid crimes, custodial rights, rape and honor killings, family courts for marital disputes, and the establishment of the National Commission on the Status of Women.

Despite Pakistan's significant efforts to improve the legal protections afforded to women, including in the workplace, legislation remains largely unimplemented resulting in continued discrimination and gender-based violence with impunity. In 2018, Pakistan ranked 148 of 149 countries (second only to Syria) in the World Economic Forum's Global Gender Gap index. Although statistics on the prevalence of gender-based violence vary across the provinces, the scale is tremendous and the consequences for individuals, families, communities, and country at large are devastating. According to a 2015 Aurat Foundation report on Violence Against Women in Pakistan, 713 women were murdered in honor killings, 65 were burned in acid attacks, and 1,515 women were raped. These numbers are likely understated, as a high percentage of sexual violence crime goes unreported.

Women, religious minorities, and the urban and rural poor remain marginalized and disadvantaged groups in Pakistan. Women and girls in poor households bear a disproportionately high share of the poverty burden largely due to the cultural practices rooted in patriarchy. Poverty, cultural norms, and geographic isolation often obstruct Pakistani women's access to education opportunities, starting at an early age and extending through secondary and tertiary education. By the time girls reach secondary education, only

34 percent remain enrolled. This contributes to significant disparities in literacy, with 45 percent of Pakistani women literate, compared to 68 percent of men. In most cases, women are not trained or provided with the relevant workforce development skills to become financially independent or be able to share the burden with family or a life partner. Their greater deprivation is due to a host of factors, including restricted mobility, lack of education and training, limited access to or ownership of resources and assets, discrimination in labor markets, and limited access to credit and social services.

Reduced investment in women's human capital, preventing and responding to gender-based violence, weak implementation of laws, compounded by the ideology of negative social biases, has led to fewer women participating in the formal labor force and leaving them economically vulnerable. However, women do participate in much greater numbers in the informal and agricultural sectors of the economy. The 2016 UN Women Report on Women's Economic Status in Pakistan estimates that home-based workers contribute approximately Rs. 400 billion or 3.8 percent of Pakistan's GDP. Women's economic contribution is neither acknowledged, nor documented in its entirety. The conditions of women workers in Pakistan's informal economy, self employment (micro-entrepreneurs), and those working on a piece rate basis (home-based workers) are even more problematic, due to the absence or weak implementation of labour laws and policies.

Social norms in Pakistan lead to women's overwhelming representation in unpaid care work. Women in Pakistan are 10 times more involved in unpaid care work than men. This is also manifested in lower literacy levels and lack of market-based skills among women and girls resulting in their sparse representation in high-skilled jobs. Providing access to a violence and harassment-free environment, affordable childcare, safe transport, residential services, and greater access to education and training are essential to encourage higher participation of women in the labor market.

Although men-operated businesses also face difficulties, women-owned businesses frequently encounter additional challenges in Pakistan. Constraints include a lack of access to basic enterprise requirements that are more often available to men-operated businesses. They also include limited access to formal financing and marketing for products, difficulties in adapting to newer technologies, and limited access to skill development for themselves and their workers. Women additionally suffer from restricted rights, limited mobility, relatively muted voice in shaping decisions that makes them highly vulnerable.

The lack of property rights for women is a key constraint. This affects both access to finance as well as other dimensions of enterprise development such as decision-making power. Complicated procedures further erode the position of women entrepreneurs in joining the formal economy. This is compounded by the challenges they face in acquiring, managing, and retaining skilled labor. High registration, transaction costs and taxes also discourage women entrepreneurs when it comes to graduating from self-employment to entrepreneurship.

According to the government's Labour Force Survey (LFS) 2017-18, women's labor force participation is only 14.5 percent compared to men 48.1, representing a severe imbalance to male participation. Moreover, these numbers are on lower side compared to LSF 2014-2015. The Government of Pakistan's key planning document, Vision 2025, recognizes women's economic concerns and commits the government to increasing women's labor force participation to 45 percent. However, this necessitates significant steps, including a comprehensive framework, to turn this commitment into a reality by 2025.

These enormous challenges can be overcome if all stakeholders - government, civil society, bilateral and multilateral partners and the private sector, work together to encourage women's economic and social participation which will lead to higher incomes for women that will translate in the well-being of their families, resilient communities and improve Pakistan's economy.

1.3 Description of Activity:

Transform seeks to reduce the gender gap in economic and social opportunity between Pakistani men and women, and will geographically focus on the Afghanistan-Pakistan border, including the Newly Merged Districts of Khyber Pakhtunkhwa (NMD/KP) and KP. The activity may expand implementation to as well as other geographic priority areas of USAID's 2018-2022 Country Development Cooperation Strategy, including Southern Punjab, Northern Sindh, and Karachi.

The goal of Transform activity is to economically empower women in focus areas, and to transform the lives of women at home, in local communities, and in society at large. The activity will assist women to earn higher incomes, build support for larger economic roles in local communities, and reduce gender based violence. Successful completion of this activity will create a more supportive environment for women's political, social, and economic empowerment. USAID thus seeks to create an environment that is supportive of women's socio-economic empowerment, free of violence, and more conducive to their labor. Achievement of this goal would decrease the economic vulnerability of women, contribute to economic growth, and strengthen community bonds in Transform areas.

USAID expects to achieve this goal through the following three objectives:

1. Help women earn higher incomes through assistance to women-owned micro businesses and women workers in targeted value chains,
2. Expand the space for and acceptance of women's labor and social participation in local communities, and
3. Reduce the risk of gender based violence through advocacy and community engagement, particularly with men and boys.

USAID envisions three primary components that support each objective of its new Transform activity:

1.3.1 Component-1: Increased incomes for women-owned micro businesses and women workers

Component 1 seeks to help women earn higher incomes through targeted assistance to women-owned micro-businesses and women workers in selected value chains. Higher incomes, including from less volatile sources, is one of the key results of economic empowerment. It empowers women to generate additional financial resources to support their well-being and to reinvest in their own productivity. It contributes to reduced economic insecurity, household poverty, and national development.

Target beneficiaries will be the most economically vulnerable women in focus geographies, including in rural and urban areas. Micro-businesses and entrepreneurship represent challenging yet promising avenues for these women to raise their incomes and develop new skills in the process. Such economic ventures may include creating products, providing services, or reselling other products.

This activity will adopt an evidence based approach to establish, nurture, and grow viable women-led micro businesses. It should seek creative ways to address the constraints to growth for these enterprises including new entrants and help these micro-businesses to identify and take advantage of new economic activities. Successful approaches will incorporate survey information and additional analysis to target activities most appropriate to the geographic areas covered under this activity.

Where it supports Transform's approach, sub-activities should leverage sustainable partnerships with the private sector, including potentially larger firms and micro-finance institutions.

1.3.2 Component-2: Expanded women's economic, social participation, and their role as peace builders in local communities

Component 2 seeks to partner with local communities to expand women's economic and social participation, as well as their roles as peace builders. Economic activity takes place against a backdrop of legal, regulatory, and cultural systems and practices. These systems and norms can create or limit economic opportunities for women as well as shape the incentives for women to pursue them. USAID believes that local communities are therefore key partners in overcoming obstacles that limit greater women's participation in the economy and larger society.

Obstacles may include social and cultural factors, women's ability to interact with and benefit from markets, access to resources, patterns of unpaid domestic and care work, limited

mobility, and the prevalence of sexual and gender-based violence. Overcoming these will require greater dialog among community leaders and an expansion of social space for women's voices in economic decision-making. Communities may find common challenges and solutions to these issues and may benefit from greater collaboration with others. Networks between communities as well as the economic institutions that support women-led micro-businesses may help beneficiaries connect to a wider pool of resources, including those of labor unions, employers' associations, women rights organizations, private sector organizations, micro-finance institutions, and local government.

In addition to expanding their role in economic and social participation, the program is expected to enhance women's roles as peace builders. Ensuring - and supporting - greater participation and leadership of women in conflict resolution and peacebuilding leads to more durable and sustainable outcomes.

Illustrative activities may include but should not be limited to:

1. Creation or enhancement of community forums that support greater women's participation in local economies and leadership in economic activity.
2. Creation or enhancement of community forums for tolerance and peacebuilding.
3. Strengthening or establishment of networks for women micro-business owners for mentorship, peer support, and other necessary resources to expand their businesses.
4. Assistance to help women bargain collectively on issues, including related to targeted value chains.
5. Engagement with industry associations, labor unions, micro-finance institutions, and/or local elected representatives to develop new economic opportunities for women workers or business owners.
6. Public advocacy campaign in support of women's economic leadership and the rights of women within their communities.
7. Strengthening or establishment of women community networks, peer groups, and other necessary resources for de-radicalization efforts including but not limited to enhancing women's role as peace builders.

1.3.3 Component-3: Reduced risk of gender based violence through advocacy and community engagement, particularly with men and boys

Component 3 seeks to reduce the risk of gender based violence through advocacy and community engagement, particularly with men and boys.

Reducing the risk of gender-based violence is a necessary component of women's economic empowerment. Social norms, particularly in conservative areas, in Pakistan's patriarchal society restrict women's mobility outside the home. Traditional cultural attitudes can discourage women as economically productive members of society and lead to the acceptability of sexual harassment and gender based violence, which act as a barrier to women's participation in the economy.

Component 3 activities will engage men and boys as well as other key stakeholders (e.g. mothers in law, etc.) in local communities as key allies and primary actors in the prevention of gender-based violence. USAID envisions that activities under this component focus primarily on prevention, rather than direct service provision to victims of violence. Transform will develop creative approaches for communicating and fostering discussion with men and boys, including creating positive role models. Successful approaches will consider how best to engage men and boys in different age groups (e.g. school-age, early adulthood, and late adulthood). Activities should be culturally appropriate for Pakistan's context and explore partnership with networks of local schools, organizations, clubs, and other institutions capable of reaching larger audiences.

Illustrative activities may include but should not be limited to:

1. Group education activities, including the participation of whole families, that discuss gender roles, misperceptions of social norms, and other issues related to gender-based violence.
2. Strategic media campaigns, including the creative use of social media.
3. Working with community groups, and religious and local leaders for positive messaging that affirms women's rights to personal safety, agency, and freedom from violence.
4. Use of ICT technology to create safety networks, neighborhood watches, connections with law enforcement and organizations that help prevent and provide support for victims of gender based violence.
5. Community engagement to enhance women's access to in-person and virtual resources and their presence in public spaces. Examples might include addressing sexual harassment in public and professional settings, including the use of transportation.

1.4 Life of Transform Budget

The life of project funding of the transform activity is summarized in the table below.

Table – 1: Life of TRANSFORM activity Estimated Budget Breakdown by objectives

Objectives	Estimated US\$
Increased Economic Opportunities for women	10
Expanded women's economic, social participation, and their role as peace builders in local communities	5
Reduced risk of gender based violence through advocacy and community engagement, particularly with men and boys	5

2.0 COUNTRY ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

Studies conducted by the GOP, USG and donor agencies^{1,2,3,4,5,6} in Pakistan have highlighted a number of environmental issues. Broadly, the areas of concern identified include uncertainty and climate variability in the design and operation of water resources projects, potential climate impacts and stress points on the energy sector, water availability for energy and food, climate change impacts on the energy sector, Indus River Basin flood management, energy, pollution, waste management, irrigated agriculture, and biodiversity. 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 six percent of GDP, and these costs fall disproportionately upon the poor⁷. 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

¹ 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/695610ESWOP10500change0ENVJune02010.pdf

² 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/917000WP0WB0PK00Box385342B00PUBLIC0.pdf

³ Pakistan: Country Snapshot World Bank Report No. 100119-PK at:

http://www-wds.worldbank.org/external/default/WDSPContentServer/WDSP/T MNA/2015/10/11/090224b083138fb7/1_0/Rendered/PDF/Pakistan000Country0snapshot.pdf

⁴ Cleaning Pakistan's Air World Bank Report No. 89065-PK at:

http://www-wds.worldbank.org/external/default/WDSPContentServer/WDSP/IB/2014/07/09/000442464_20140709123335/Rendered/PDF/890650PUB0Clea00Box385269B00PUBLIC0.pdf

⁵ 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>

⁶ Indus Basin Floods ADB Report at:

<http://www.adb.org/sites/default/files/publication/30431/indus-basin-floods.pdf>

⁷ 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/695610ESWOP10500change0ENVJune02010.pdf

country's forest cover has declined steadily, from 2.3 percent of total land area in 2008 to 2.1 percent in 2011, due largely to logging, agricultural clearing, and fuelwood harvesting.⁸

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.

3.0 LEGISLATIVE AND REGULATORY FRAMEWORK

3.1 National Environmental Policies and Legislation⁹

3.1.1 Pakistan Environmental Protection Act 1997¹⁰

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

3.1.2 Pakistan IEE/Environmental Impact Assessment (EIA) Regulation, 2000^{11 12}

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.

3.1.3 National Environmental Quality Standards (NEQS) 2000¹³

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).

⁸ Country Partnership Strategy: Pakistan, 2015–2019 ADB Report at:

<http://www.adb.org/sites/default/files/linked-documents/cps-pak-2015-2019-cpa.pdf>

⁹ <http://www.environment.gov.pk/> and <http://www.lexadin.nl/wlg/legis/nofr/oeur/lxwepak.htm>

¹⁰ <http://www.environment.gov.pk/act-rules/Brief-PEPA-Act1997.pdf>

¹¹ <http://www.environment.gov.pk/act-rules/IEE-EIA-REG.pdf>

¹² <http://environment.gov.pk/> with links to provincial offices with environment responsibilities

¹³ <http://www.environment.gov.pk/NEQS/SRO549%20I2000-NEQS.pdf> covers liquid industrial effluents

3.1.4 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.

3.1.5 Building Codes / Seismic Standards

Pakistan is one of the most seismically active countries in the world. Following the devastating October 2005 earthquake, on August 26, 2007, the new Pakistan Building Code went into effect throughout the country¹⁴. 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.

3.1.6 Local Government Ordinance, 2001

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

3.2 Provincial Environmental Policies and Legislation

3.2.1 Punjab Province

3.2.1.1 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.

¹⁴ The new building code replaced the 1986 Pakistan Building Code, which was never formally adopted by as a government regulation.

3.2.1.2 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.

3.2.2 Sindh Province

3.2.2.1 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.

3.2.2.2 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.

3.2.3 Khyber Pakhtunkhwa Province (KPK)

3.2.3.1 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.

3.2.3.2 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.

3.2.4 Balochistan Province

3.2.4.1 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.

3.2.4.2 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.

3.2.4.3 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.

3.2.4.4 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.

3.2.4.5 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.

3.2.5 Gilgit Baltistan Region**3.2.5.1 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.

3.2.6 Azad Jammu & Kashmir (AJK)**3.2.6.1 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.

3.2.6.2 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 of 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 legislation there are regulations on usufruct right of the communities or individuals for using the area for grazing or acquiring wood for fuel wood or timber. However, special permission is required from the Forest Department and Revenue Department/Local Administration for cutting trees for the construction of a project depending upon the type of forest encountered.

3.2.6.3 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.

3.3 International Environmental Treaties Ratified by Pakistan

Pakistan is a signatory to a number of international environmental agreements such as the, 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, international trade, and 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

3.4 USAID Climate Risk Screening Requirements

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

3.5 USAID Environmental Compliance Requirements

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

To promote pesticide safety, USAID environmental regulations require the preparation of a Pesticide Evaluation Report and Safe Use Action Plan (PERSUAP) for any pesticide or chemical that is used as a pesticide. USAID prepared a program level PERSUAP for its activities in Pakistan. Certain waste materials may contain chemicals that are regulated by the PERSUAP. Transform does not currently involve use of pesticide. In case a need arise for pesticide use or recommendation, Transform will follow the BEO/OAPA-approved "2017 Pakistan Programmatic PERSUAP (2017 PPERSUAP), as amended, provided at:

<http://gemini.info.usaid.gov/cgat/envcomp/repository/pdf/40676.pdf>

4.0 CLIMATE CHANGE INTEGRATION

4.1 Country Climate Change Information (Baseline Information)^{15, 16, 17}

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 (December-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, the 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, earthquakes, 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 weather event, 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.

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

¹⁵ Global Climate Risk Index 2017, available at: <https://germanwatch.org/en/download/16411.pdf>

¹⁶ USAID/Pakistan FAA 118/119, Climate Change, and Ecosystem Services Assessment

¹⁷ Pakistan Climate Vulnerability Profile available at:

<https://www.climateipks.org/resources/pakistan-climate-vulnerability-profile>

4.2 Project Activities And Recommended Climate Risk Management Actions:

The Transform design team used USAID's Climate Risk Screening Tool to assess the potential climate risks for this activity. 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.

Activities under Transform entail the provision of small scale equipment and supplies, technical assistance, training, workshops, community forums, establish networks, capacity building to improve coalition-building efforts, facilitate the formation of strategic alliances and partnerships, expand the USG's geographic reach, and encourage private public partnerships.

The assessment 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 on the activities across three areas (Section 1.3). The timeframe was limited to ten years as the duration of Transform is not expected to exceed five to six years, and substantive physical structures will not be funded.

The assessment indicated moderate risk for activity 1 and low risk for activity 2 and 3 as mentioned in below table. The activities involve technical assistance that may include purchase of small scale equipment, establishing linkages and networks, advocacy, and communication. A summary of the conclusions from the analysis is presented in the Table 2 below.

Table 2: Activity-Level Climate Risk Management Summary Table

Illustrative Interventions	Risks	Risk Rating	How Risks Addressed /Accepted	Opportunities to Strengthen Climate Resilience
Skills and Business Development technical assistance to women	Moderate	Moderate	Transform activity sites should be in a safe place, considering the potential flood threat and also sites should be sufficiently ventilated to deal with heat waves. Transform should survey infrastructure to fully	None

DCN: _____

			assess risks in target districts.	
Strengthened linkages, establishing networks including geographic survey	None	Low	Not Required	None
Advocacy campaigns including mass media for women's social participation in community forums and reducing the risk of gender based violence.	None	Low	Not Required	None

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

This IEE satisfies the conditions of the environmental procedures for project activities and delegation of environmental review responsibility to Missions.

5.1 Environmental Threshold Determinations

The following determinations are recommended

5.1.1 Categorical Exclusion per 22 CFR 216.2(c)(2)(i),(iii) and (v) (\$6 million / 30%)

It is recommended for technical assistance, in-kind and monetary grant activities associated with implementation, and the implementation of proposed actions that do not have an effect on the natural or physical environment. *The life of project value for the sum of these activities is not to exceed \$6 million (30% of LOP amount).* Such activities may include the following:

- Project/activity 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

studies, etc.), surveys, mapping, workshops, seminars, conferences, meetings, enterprise resource planning, consultations, 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.

5.1.2 Negative Determination with Conditions per CFR 216.3(a) (2)(iii), (\$14 million/70%)

A Negative Determination with Conditions is recommended for all other activities undertaken in the projects that are not listed above for which a Categorical Exclusion is recommended. The activities qualifying for a Negative Determination with Conditions are further defined in Section 5.5, Summary Threshold Determinations, Table 3, in this IBE. 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 \$14 million (70% of LOP amount).* These activities are recommended for Negative Determination with Conditions per 22 CFR 216.3(a)(2)(iii), the Threshold Decision Conditions are described in detail in Section 5.2, 5.3 and 5.4.

5.2 Mitigation, Monitoring and Evaluation

Project activities will have differing Mitigation, Monitoring and Evaluation requirements.

1. **Categorical Exclusion:** These activities will have no effect on the environment and require no Mitigation, Monitoring and Evaluation.
2. **Negative Determination with Conditions (NDC):** Such facilities can have minor or moderate, adverse effect on the environment and require Mitigation, Monitoring and Evaluation measures. An Environmental Declaration Form (EDF) is required for each activity so classified. In preparing the EDFs, the implementer will identify potential adverse environmental risks and impacts, and will identify mitigation measures.

Quarterly Reports will include a section entitled Environmental Compliance that provides details on indicators, mitigation efficacy, and unintended environmental consequences of activities.

The following additional references may help in the preparation of Environmental Manual (EM), EDFs and their Environmental Mitigation and Monitoring Plans (EMMPs).

- a) Environmentally Sound Design (ESD) Sector Environmental Guidelines, on USAID

gems website, discusses potential environmental impacts, mitigation measures, and monitoring measures for small scale activities

<http://www.usaidgems.org/sectorGuidelines.htm>

- b) Guidance Manual for Developing Best Management Practices, USEPA – Best management practices (BMPs) are recognized as an important part of controlling releases of pollutants to receiving waters and reduce costs as well as pollution risks through source reduction and recycling/reuse techniques. <http://www.epa.gov/npdes/pubs/owm0274.pdf>
- c) International Finance Corporation (IFC) Environmental, Health and Safety Guideline – <http://www.ifc.org/wps/wcm/connect/554e8d80488658e4b76af76a6515bb18/Final%2B-%2BGeneral%2BEHS%2BGuidelines.pdf?MOD=AJPERES>
- d) European Bank for Reconstruction and Development (ERBD) Sub-Sectoral Environmental and Social Guidelines at: <http://www.ebrd.com/about/policies/enviro/sectoral/>

5.3 Additional Conditions

5.3.1 USAID A/COR and Project Manager Responsibility

The A/COR shall ensure that:

- a) All conditions, limitations, and stipulation for revisions are fully transposed into relevant procurement instruments, and A/COR together with the MEO shall explain these to the contractor(s) at the “post award” conference.
- b) During implementation of activities, all requirements defined in EDFs, and in their attached EMMPs, will be complied with. Compliance reporting is complete and submitted to the A/COR for review according to the agreed schedule.
- c) All activity work plans include the required compliance/mitigation measures, including the appropriate IEE, EDF, and EMMP references, and progress reports must discuss status and progress in mitigation and compliance actions.
- d) Implementer is required to evaluate climate-related risks and vulnerabilities, and to adjust activities, as appropriate, based on relevant analysis.
- e) Implementer is required to evaluate and integrate ecosystem services, as warranted, into planning, design, and implementation of site-specific activities.
- f) In accordance with Agency policy and USAID/Pakistan Mission Order, 200.8, on Construction Oversight Procedures, dated 12/10/2013, adequate USAID engineering oversight must be applied to ensure that environmentally sound design, specifications, materials, engineering monitoring and evaluation (M&E), and best management practices (BMPs) to: i) Minimize impact on the environment during the design, implementation, and life of operation of the activities; and ii) Minimize erosion, debris and waste production, and proper disposal of debris and waste. Therefore, all engineering/construction designs, guidance, and specifications are submitted to the USAID Office of Infrastructure and Engineering for review and approval that they meet applicable environmental, OHS, and construction standards.

- No work shall commence prior to receipt of such approval(s).
- g) All EDF/EMMPs and climate risk screening are reviewed and approved by the A/COR and the MEO/CIL, and maintained in official project files.
 - h) No "Negative Determination with Conditions (NDC)" activities shall be conducted prior to receiving approval of the EDF/EMMP from the A/COR and MEO.
 - i) All environmental compliance requirements of U.S. law 22 CFR 216 and all environmental conditions established in this IEE, shall be duly transposed in the Request for Proposal/Assistance (RFP/A), Contract, and all sub-contracts.
 - j) A/COR monitors the implementer's processes and required reporting of inspections as per the EMMP to ensure compliance with 22 CFR 216 requirements throughout the life of the Contract/Agreement.

5.3.2 Implementing Partner Responsibility

The Implementer shall ensure that:

- a) All activities will be implemented in accordance with Pakistani environmental, Occupational Health and Safety (OHS), and construction regulations, standards, norms and guidelines, and national obligations under ratified international environmental agreements (see: <http://www.environment.gov.pk>), conditions established in the approved EAs done for each project and in their absence in accordance with the best international practice appropriate to the seismicity and flood conditions in Pakistan, and in respective districts. These should be acceptable to USAID.
- b) All applicable GOP environmental requirements will be satisfied prior to commencement of work, during implementation, and as required post-commissioning.
- c) The Implementer shall include environment compliance considerations in all aspects of project implementation and will promote and train local counterparts on environmental requirements and standards across all of the project's activities. Such proposed activities will be included in annual work plans, and results will be reported in annual reports.
- d) The Implementer will have adequate funds to implement environmental mitigation and monitoring measures and will have qualified, A/COR and MEO-approved environmental impact professional(s) (EIP) who will assess and recommend environmental actions to be taken by the project and will coordinate implementation of mitigation measures, monitoring, and reporting.
- e) The implementer is required to prepare a site or route-specific EDF and EMMP identifying potential adverse environmental risks and impacts, mitigation measures, monitoring and inspection schedule, and entities required to insure compliance with the EMMP. The referred EDF/EMMP must be developed and approved by the A/COR and MEO prior to commencement of the activity. Monitoring and mitigation activities must be incorporated into Annual Work Plans and Performance Monitoring Plans. A Template for the EMMP is attached to this IEE.
- f) The activity grant manual (if prepared) must include a separate annex on

Environmental Compliance Requirements that outlines the procedures for screening of activities with the requisite EDF/EMMP templates attached. This annex may be adapted from previously approved environmental compliance guidelines approved in the Mission.

- g) The Implementers shall minimize the use of, and properly dispose of, hazardous materials and wastes for all project activities. The Implementers will adhere to US Environmental Protection Agency (EPA) guidance at www.epa.gov/asbestos and www.epa.gov/lead/pubs/renovation.htm for dealing with asbestos and lead.
- h) The recipient will properly manage and dispose of equipment (computers, electric power generation & distribution equipment, laboratory equipment, 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/ads/policy/300/312> 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.
- i) All environmental conditions established in this IEE, including completed EDFs, EMMPs, and EAs shall be duly transposed into the Contract(s), Cooperative Agreement(s), and all sub-contracts and sub-agreements.
- j) Implementer(s) shall document and regularly report to USAID on implementation of Negative Determination with Conditions (NDC) activities; reporting will include photographic documentation and site visit reports confirming implementation of the agreed EMMP, photos of site-specific activities prior to, during, and after rehabilitation and renovation activities, and during operation. All Environmental Compliance Reports will provide details on indicators, mitigation efficacy, and unintended environmental consequences of activities. All inspection reports made by the implementing partner must be in writing, signed by the implementing partner's representative.
- k) All activities that provide "drinking" or potable water require water quality testing. This testing provides proof that the water meets minimum GOP and World Health Organization (WHO) portable water standards determining that the water is safe to drink, and to set a baseline so that any future degradation can be detected. Among the water quality tests that must be performed are tests for the presence of arsenic and the design must ensure that potable water meets USG drinking water standard for arsenic. The Implementer must assure that the (WHO and GOP) standards, and testing procedures are followed for potable water supply activities under this program. The water must be tested at least each quarter for a one year period.
- l) This clearance is granted on the condition that all mitigation and monitoring measures

specified in the environmental review are binding requirements.

5.4 Responsibility for Compliance

- a) The USAID Office of Stabilization and Governance Team Leader, Team Members, A/COR and MEO are responsible for ensuring full compliance with [22 CFR 216](#), the Agency's environmental procedures, during implementation of their operating unit's strategy. The A/COR authority and responsibilities are delegated by the Contracting/Agreement Officer. The responsibilities of the A/COR and Development Objective Teams include designing, monitoring, and modifying programs, projects, activities and amendments, and Activity Approval Documents.
- b) The A/CORs and MEO will closely monitor all sub-project/activity development. Mission Order 200.6 and Mission Order 200.5 require the MEO to be a core member of all activity design teams. The A/CORs and MEO will ensure that all activities have appropriate initial environmental reviews included and formalized in BEO approved IEEs.
- c) The Mission's Climate Integration Lead (CIL) in the Office of Program Management is a resource person for guidance and advice on climate risk assessment, monitoring and mitigation, and the integration of climate resilience in strategies, projects and activities in the Mission.
- d) The primary burden of field compliance with USAID's environmental regulations falls on implementing partners (contractors, grantees, and participating agencies) who receive USAID funds for activities. Each implementing partner must demonstrate to USAID/Pakistan that it is in compliance with USAID's environmental regulations. The USAID A/COR is responsible to ensure compliance through oversight management, regular monitoring, and review of reports.
- e) USAID/Pakistan is responsible for conducting IEEs prior to obligation of funds to implementing partners, and for actively monitoring ongoing activities for compliance, modifying or ending activities that are not in compliance, and ensuring that adequate time and resources are available to bring all activities into compliance with the requirements of this IEE (ADS 204.5.4). If additional activities not described in this document are added to this project, an amended environmental examination must be prepared.

5.5 Summary Table:

A summary of the Threshold Determinations for the project activities are presented below;

Table-3: Summary Threshold Decisions for New Activity

Activities	Categorical Exclusion
------------	-----------------------

DCN: _____

● Project / Program Management ● Technical assistance, capacity building, advocacy, training programs except to the extent such programs include activities may not directly affecting the environment. ● Financial, accounting, management and other capacity building ● Group education activities that discuss gender roles, misperceptions of social norms, and other issues related to gender-based violence.	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. ● Geographic survey of industries in target areas with prevalent women-led micro-businesses, including opportunities for new entrants ● Creation or enhancement of community forums that support greater women's participation in local economies and their role as peace builders. ● Establishment of networks for women micro-business owners for mentorship, peer support, and other necessary resources to expand their businesses.	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. ● Public advocacy campaign in support of women's economic leadership and the rights of women within their communities.	No adverse effect on the natural or physical environment.	Categorical Exclusion per 22 CFR 216.2(c)(2)(v)

• Mass media campaigns, including the creative use of social media • Working with community groups, religious and local leaders for positive messaging, expanding presence of women and promotion of women leadership				
Negative Determination with Conditions.				
Provision of furniture, equipment, tools, machines, vehicles, computers; IT equipment, multimedia, laboratory, electronic etc.	Minor to moderate adverse effects on the natural or physical environment	Negative Determination with Conditions per 22 CFR 216.3 (a)(2)(iii) The activity will properly manage and dispose of equipment (tools, machines, vehicles, computers; IT 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, and USAID Pakistan/OIE 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.		
Increased Economic Opportunities for women				
1. Business development assistance for women-led micro-businesses 2. Skills development or quality control assistance that lead to higher revenues 3. Provision of or strengthened linkages between women and financial services, markets, and productive tools and technology	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 projects/activities have a site specific EDF with an EMMP. Please refer to Section 5.2, 5.3 and 5.4 for detail list of conditions. Equipment purchase must meet applicable specifications in ADS 312.		
Expanded women's economic, social participation, and their role as peace builders in local communities				

DCN: _____

Engagement with industry associations, labor unions, micro-finance institutions, and/or local elected representatives to develop new economic opportunities for women workers or business owners.	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 projects/activities have a site specific EDF with an EMMP. Please refer to Section 5.2, 5.3 and 5.4 for detail list of conditions.
---	---	---

6.0 ALLOCATION, TRAINING AND REPORTING REQUIREMENTS:

- a) Reports will be submitted to the A/COR.
- b) Progress reports submitted by Implementing Partners to USAID shall contain a section specific to environmental mitigation and monitoring and will include photographic documentation, site visit reports and project summaries along with environmental impacts, success or failure of mitigation measures being implemented, results of environmental monitoring, and any major modifications or revisions to the project, environmental mitigation measures, or environmental monitoring procedures.
- c) On the request of the Implementer, the A/COR and MEO will provide training on the environmental compliance as appropriate. The A/CORs will determine when and if this training is required. The A/COR or MEO will explain to the Implementing Partner(s) all environmental conditions established in this IEE and their applicability to specific activities.
- d) The Program Manager/COR are encouraged to continue monitoring the possible impacts of climate change on project activities as circumstances may change. The CIL is a technical resource for guidance on climate risk assessment, monitoring and mitigation.
- e) All USAID implementers and beneficiaries that use or procure pesticides with project assistance perform IPM and Safe Pesticide Use training in accordance with the recommendations of BEO/OAPA-approved "2017 Pakistan Programmatic PERSUAP (2017 PPERSUAP), as amended, provided at:
<http://gemini.info.usaid.gov/egat/envcomp/repository/pdf/40676.pdf>

7.0 LIMITATIONS OF THE IEE:

This assistance does not cover activities involving:

- a) Assistance, procurement or use of genetically modified organisms (GMOs) will require preparation of a biosafety assessment (review) in accordance with ADS 201.3.9.3.b in an amendment to the IEE reviewed by the Agency Biosafety Review Advisor and concurrently approved by BEO/OAPA.
- b) Assistance, procurement or use of non-native, potentially invasive species of flora and fauna, will require preparation of an appropriate assessment and an amendment to the IEE reviewed and approved by BEO/OAPA.
- c) Procurement or use of Asbestos, Lead and Mercury Containing Materials (ALMCM) i.e.

pipings, roofing, etc., Polychlorinated Biphenyl's (PCB) or other toxic/hazardous materials prohibited by the US EPA as provided at: <http://www.epa.gov/asbestos>, <http://www2.epa.gov/lead>, <http://www.epa.gov/mercury/> and/or under international environmental agreements and conventions (e.g. Stockholm Convention on Persistent Organic Pollutants as provided at: <http://chm.pops.int/>).

- d) USAID/Pakistan restricts the use of USAID funds, directly or indirectly, to produce, acquire, use, transport, store, sell, or otherwise deal with ammonium nitrate (AN) and calcium ammonium nitrate (CAN) for agricultural or rehabilitation and renovation activities and construction/demolition purposes.
- e) Global Development Alliances (GDAs) and/or Development Credit Authority (DCA) activities.

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

8.0 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. If warranted, an environmental assessment will be launched and a scoping statement and environmental assessment report prepared. The scoping and EA process, if determined necessary during scoping, will follow and comply with 22 CFR 216.3(a)(4). It is the responsibility of the COR/AOR/PM to 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, in a timely manner.

DCN: _____

Attachment 1

**Environmental Documentation Form (EDF)
Women's Economic and Social Empowerment (Transform) Activity**

A. Applicant information

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

B. Activities, screening results, and recommended determination

TABLE 1 Proposed Sub-activities	Screening result (Step 3 of instructions)			Recommended Determinations (Step 6 of instructions. Complete for all moderate and high-risk activities)		
	Very Low Risk	Moderate Risk	High Risk	No significant adverse impact	With specified mitigation, no significant adverse impact,	Significant Adverse impact
1.						
2.						
3.						
4.						
5.						
6.						

(continue on additional page if necessary)

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

The activity contains. . .	(equivalent regulation 216 terminology)
----------------------------	---

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

D. Certification:

I, the undersigned, certify that:

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

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

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

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

(Signature)

(Date)

BELOW THIS LINE FOR USAID USE ONLY**Approval**

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

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

DCN: _____

Attachment 2

**US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE)
Women's Economic and Social Empowerment (Transform) Activity
Environmental Mitigation & Monitoring Plan (EMMP)**

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

Environmental Mitigation and Monitoring Plan:

Activity Title:

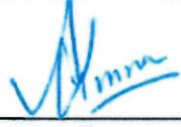
Implementing Partner:

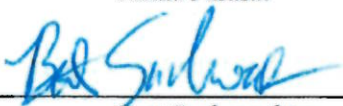
Activity	Mitigation Measure(s)	Monitoring Indicator(s)	Monitoring and Reporting Frequency	Party(ies) Responsible	Indicative Budget
List all activities in IEE that received a "negative determination with conditions." <i>Do not list any other activities in separate rows.</i>	If mitigation measures are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

**US Agency for International Development (USAID) / Pakistan
Initial Environmental Examination (IEE)
Women's Economic and Social Empowerment (Transform) Activity**

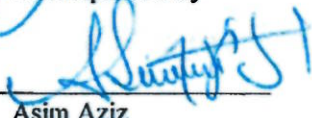
CLEARANCE / APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

CLEARANCE:

Activity Manager:  Date: 01/30/19
Amna Farasat

Office Deputy Director:  Date: 01/30/2019
OSG Bret Saalwaechter

Office Director:  Date: 1/30/19
OSG Randolph B. Flay

Mission Environmental Officer:  Date: 01/30/19
Mission Climate Integration Lead Asim Aziz

Regional Environmental Advisor: cleared via email Date: Jan 28, 2019
Central, South Asia and OAPA Andrei Barannik

Office Director:  Date: 1/21/19
(OPM) Theodora Dell

Deputy Mission Director:  Date: 2/7/19
Helen M. Pataki

APPROVAL:

Mission Director:  Date: 2-8-2019
Jerry Bisson

CONCURRENCE:

Bureau Environmental Officer:  Date: 2/11/2019
OAPA Christopher Payne

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



Asim Aziz <aaziz@usaid.gov>

MOST URGENT - IEE for Transform activity

Andrei Barannik <abarannik@usaid.gov>
To: Asim Aziz <aaziz@usaid.gov>

Mon, Jan 28, 2019 at 8:19 PM

Dear Asim -

I reviewed - looks OK - few comments:

- pls review one more time to avoid repetitions in conditions (e.g. 5.1.2 and 5.2) and make these practical, common sense as sub-activities, I guess, will be small-scale in clearly identifiable (sub-) sectors, and merge some conditions where MEO and CIL are separated; use MEO/CIL term thru not separate
- delete DMEO as your Mission does not have one, I believe
- on signature page use term BEO/OAPA.

With above done, I clear.

Please have a clean copy duly signed in the Mission and send it to Chris Payne, BEO/OAPA for his review and concurrence.

W/r & stay safe,

Andrei

[Quoted text hidden]

--

**Andrei D. Barannik**

Regional Environmental Adviser for Central and South Asia, and for
Office of Afghanistan and Pakistan Affairs

1300 Pennsylvania Ave., NW, 5.06-29**Washington, D.C., 20523**

Land line: 1.202.712.4161

Cell phone: 1.571.216.7243

E-mail: abarannik@usaid.govUSAID Environmental Compliance Database: <https://ecd.usaid.gov/>LAND | [URBAN](#) & <https://www.climatelinks.org/>