



USAID
FROM THE AMERICAN PEOPLE

INITIAL ENVIRONMENTAL EXAMINATION

PROJECT/ACTIVITY DATA

Project/Activity Name:	Children and Youth Education Response Activity (CYERA)
Geographic Location(s) (Country/Region):	DRC/Africa
Amendment (Yes/No), if Yes indicate # (1, 2...):	No
Implementation Start/End Date (FY or M/D/Y):	04/15/2020 to 04/14/2025
If Amended, specify New End Date:	NA
Solicitation/Contract/Award Number:	TDB
Implementing Partner(s):	TBD
Bureau Tracking ID:	
Tracking ID of Related RCE/IEE (if any):	DRC Integrated Youth Dev. Activity (HRG) IEE Amendment # 1. ECD Permalink: https://ecd.usaid.gov/document.php?doc_id=50670
Tracking ID of Other, Related Analyses:	NA

ORGANIZATIONAL/ADMINISTRATIVE DATA

Implementing Operating Unit(s): (e.g. Mission or Bureau or Office)	USAID DRC
Other Affected Operating Unit(s):	NA
Lead BEO Bureau:	AFR BEO Brian Hirsch
Funding Account(s) (if available):	
Original Funding Amount:	\$29,500,000
If Amended, specify funding amount: NA	NA
If Amended, specify new funding total: NA	NA
Prepared by:	Diane Mbanzidi, Mission Environmental Officer and Pascal Tshimanga, Senior Education Program Manager
Date Prepared:	07/16/2019

ENVIRONMENTAL COMPLIANCE REVIEW DATA

Analysis Type:	☒ Environmental Examination	☐ Deferral
Environmental Determination(s):	☒ Categorical Exclusion(s) ☒ Negative ☐ Positive ☐ Deferred (per 22 CFR 216.3(a)(7)(iv))	
IEE Expiration Date (if different from implementation end date):	07/ 16/2023	
Additional Analyses/Reporting Required:	EMMP, CRM	
Climate Risks Identified (#):	Low <u>X</u>	Moderate <u>X</u> High
Climate Risks Addressed (#):	Low	Moderate <u>X</u> High

THRESHOLD DETERMINATION AND SUMMARY OF FINDINGS

PROJECT/ACTIVITY SUMMARY

The purpose of Children and Youth Education Response Activity (CYERA) is to assist Crisis- and conflict-affected Congolese children and youth to acquire foundational skills through responsive basic education opportunities.

CYERA will target children and youth (both girls and boys) living in crisis- and conflict-affected areas of DRC provinces of Ituri, North Kivu, South Kivu, and Kasai Central, with capacity to deliver rapid basic education response services in the provinces of Kasai, Kasai Oriental and Tanganyika.

ENVIRONMENTAL DETERMINATIONS

This IEE for Children and Youth Education Response Activity (CYERA) recommends **Categorical Exclusion (CE) and Negative Determinations with Conditions (NDWC)**

TABLE 1: SUMMARY OF ENVIRONMENTAL DETERMINATIONS

Projects/Activities	Categorical Exclusion Citation (if applicable)	Negative Determination	Positive Determination	Deferral
IR 1: Increased access to responsive basic education services				
Activity 1: Community mobilization and empowerment of school governance actors for safe learning environments	22 CFR 216.2.(c)(2)(i)			
Activity 2: Capacity building of local education and child protection actors for crisis preparedness and responsiveness		X		
Activity 3: Implementation of crisis response plans		X		
Activity 4: Civil society capacity building for enhanced delivery of non-formal education services	216.2(c)(2)(i)			
Activity 5: Household grants or support to income generating activities for increased parents' financial capacity to afford education-related expenses		X		
IR2: Improved delivery of quality, gender- and crisis-responsive foundational skills instruction				
Activity 1: Teacher training	216.2(c)(2)(i)			
Activity 2: Printing and distribution of teaching and				

learning materials (TLMs)				
Activity 3: Psychosocial support for improved teacher well-being				

CLIMATE RISK MANAGEMENT

The CYERA design team used USAID's "Climate Risk Screening Tool" and DRC Climate Risk Profile to assess the potential climate risks. 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.

The climate risk has identified 4 risks: Rising temperatures, more variable rainfall, prolonged dry spells increased and extreme weather and flood. The team has the risk as below.

TABLE 2: SUMMARY OF CLIMATE RISK MANAGEMENT

Defined or Anticipated Project Elements	Climate Risk	Rating
IR 1: Increased access to responsive basic education services Activity 1: Community mobilization and empowerment of school governance actors for safe learning environments Activity 2: Capacity building of local education and child protection actors for crisis preparedness and responsiveness Activity 4: Civil society capacity building for enhanced delivery of non-formal education services IR2: Improved delivery of quality, gender- and crisis-responsive foundational skills instruction Activity 1: Teacher training Activity 3: Psychosocial support for improved teacher well-being	Rising temperatures Increased frequency of intense rainfall Prolonged dry spells Increased extreme weather and floods	Moderate
IR 1: Increased access to responsive basic education services Activity 3: Implementation of crisis response plans (which could include school refurbishments, small grants to local communities, etc.) Activity 5: Household grants or support to income generating activities for increased parents' financial capacity to afford education-related expenses	Rising temperatures Increased frequency of intense rainfall Prolonged dry spells Increased extreme weather and floods	This activity is not well defined yet, an activity level CRM shall be completed by the IP and submitted to USAID for approval prior to activity implementation.
IR2: Improved delivery of quality, gender- and crisis-responsive foundational skills instruction	Rising temperatures	High

Activity 2: Printing and distribution of teaching and learning materials (TLMs)		
	Increased frequency of intense rainfall	Moderate
	Prolonged dry spells	
	Increased extreme weather and floods	

BEO SPECIFIED CONDITIONS OF APPROVAL

[BEOs may provide specific conditions tied to their approvals. Please follow Bureau-specific guidance. In cases where no additional conditions of approval are required, this section receives a “N/A”. In the event the BEO wishes to provide further commentary regarding the analysis, they may do so here. This approach is used to provide direct and specific conditions to the IPs and may be presented in three parts: 1) Issue; 2) Discussion; 3) Condition.]

IMPLEMENTATION

In accordance with 22 CFR 216 and Agency policy, the conditions and requirements of this document become mandatory upon approval. This includes the relevant limitations, conditions and requirements in this document as stated in Sections 3, 4, and 5 of the IEE and any BEO Specified Conditions of Approval.

General Implementation & Monitoring Conditions: The negative determinations recommended in this IEE are contingent on full implementation of a set of general monitoring and implementation requirements specified in this IEE, including: (1) Implementing Partner briefings on environmental compliance responsibilities; (2) Development of environmental mitigation and monitoring plans (EMMPs) or other required environmental compliance documents; (3) Integration and implementation of EMMPs or others required document in work plans and budgets; (4) Integration of compliance responsibilities in prime and sub-contracts and grant agreements; (5) Assurance of sub-grantee and sub-contractor capacity and compliance; (6) Environmental compliance monitoring; (7) 22 CFR 216 documentation coverage for new or modified activities; and (8) Compliance with host country requirements. The EMMP, which identifies the IEE conditions and mitigation measures for each award, must be developed using the EMMP template (http://www.usaidgems.org/Documents/templates/EC_Template_EMMP_Arial_Update.docx.)

General Restrictions: For purposes of compliance with USAID procedures, Genetically Modified Organisms (GMOs) or Living Modified Organisms (LMOs) are defined as “living organisms modified by genetic engineering techniques” and include, e.g., plants, microorganisms, live animal vaccines (if used outside a contained area and not approved in the US), animals, and insects. This IEE does not authorize support for laboratory or field-based research involving GMOs/LMOs, nor does it authorize support for multiplication, confined field testing, open release, or commercialization of GMOs/LMOs. Support for laboratory research involving GMOs/LMOs in contained facilities would require an approved amendment to this IEE. Support for field testing or open release of GMOs/LMOs would require successful review under USAID’s Biosafety Procedures followed by an approved IEE amendment.

Pesticides: All activities that fall outside of the category of “controlled experimentation exclusively for the purpose of research and field evaluation” and entail the procurement or use or both, of pesticides are not covered by this IEE. Any procurement or recommended use of pesticides will comply by with the approved DRC_wide_ Agriculture PERUAP (Pesticide Evaluation Report and Safer Use Action Plan: <https://ecd.usaid.gov/repository/pdf/50298.pdf> as per 22 CFR 216.3(b). Prior to any procurement or use of pesticides, a SUAP should be submitted and approved by USAID.

USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

PROJECT/ACTIVITY NAME: CHILDREN AND YOUTH EDUCATION RESPONSE ACTIVITY

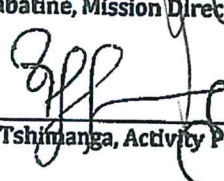
Bureau Tracking ID: AFRICA (EAST)

Approval:


Paul Sabatine, Mission Director or Washington DC Equivalent

8/26/2019
Date

Clearance:


Pascal Tshimanga, Activity Planner

7/19/2019
Date

Clearance:


Diane Mbanzidi, Mission Environmental Officer and Climate
Integration Lead

7/22/2019
Date

Clearance:


David Kinyua, Regional Environmental Advisor

08/09/2019
Date

Clearance:

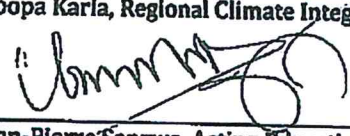

Colin Quinn

Colin Quinn August 21, 2019

Roopa Karla, Regional Climate Integration Lead

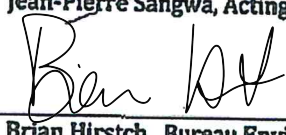
Date

Clearance:


Jean-Pierre Sangwa, Acting Education Office Director

7/15/2019
Date

Concurrence:


Brian Hirstch, Bureau Environmental Officer

09/24/19
Date

Date

DISTRIBUTION: [Distribution lists may be customized by Bureau or Mission. Please follow Bureau- or Mission-specific guidance.]

INITIAL ENVIRONMENTAL EXAMINATION

PROJECT/ACTIVITY NAME: CHILDREN AND YOUTH EDUCATION RESPONSE ACTIVITY (CYERA)

Bureau Tracking ID: _AFR (East)

Contents

PROJECT/ACTIVITY DATA	1
ORGANIZATIONAL/ADMINISTRATIVE DATA	1
ENVIRONMENTAL COMPLIANCE REVIEW DATA	1
THRESHOLD DETERMINATION AND SUMMARY OF FINDINGS	2
PROJECT/ACTIVITY SUMMARY	2
CLIMATE RISK MANAGEMENT	3
BEO SPECIFIED CONDITIONS OF APPROVAL	4
IMPLEMENTATION	4
USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION	5
1.0 PROJECT AND ACTIVITY DESCRIPTION	7
1.1 PURPOSE AND SCOPE OF IEE	7
1.2 PROJECT/ACTIVITY OVERVIEW	7
1.3 /ACTIVITY DESCRIPTION	8
2.0 BASELINE ENVIRONMENTAL INFORMATION	9
2.1 LOCATIONS AFFECTED AND ENVIRONMENTAL CONTEXT (ENVIRONMENT, PHYSICAL, CLIMATE, SOCIAL)	9
2.2 APPLICABLE AND APPROPRIATE PARTNER COUNTRY AND OTHER INTERNATIONAL STANDARDS (E.G. WHO), ENVIRONMENTAL AND SOCIAL LAWS, POLICIES, AND REGULATIONS	13
3.0 ANALYSIS OF POTENTIAL ENVIRONMENTAL RISK AND RECOMMENDED MITIGATIONS	15
4.0 ENVIRONMENTAL DETERMINATIONS	18
4.1 RECOMMENDED ENVIRONMENTAL DETERMINATIONS	18
4.2 CLIMATE RISK MANAGEMENT	19
5.0 CONDITIONS AND MITIGATION MEASURES	24
5.1 CONDITIONS	24
6.0 LIMITATIONS OF THIS INITIAL ENVIRONMENTAL EXAMINATION	25
7.0 REVISIONS	26
ATTACHMENTS:	27

1.0 PROJECT and ACTIVITY DESCRIPTION

1.1 PURPOSE AND SCOPE OF IEE

The purpose of this document, in accordance with Title 22, Code of Federal Regulations, Part 216 (22CFR216), is to provide a preliminary review of the reasonably foreseeable effects on the environment of the Children and Youth Education Response Activity (CYERA) interventions, in the DRC, described herein and recommend determinations and, as appropriate, conditions, for these activities. Upon approval, these determinations become affirmed, per 22CFR216 and specified conditions become mandatory obligations of implementation. This IEE also documents the results of the project/activity level Climate Risk Management process in accordance with USAID policy (specifically, ADS 201mal).

This IEE is a critical element of USAID's mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation. Potential environmental impacts should be addressed through formal environmental mitigation and monitoring plans (EMMPs) and/or Environmental Assessments (EAs), if needed.

This IEE also makes reference to findings in the USAID/DRC Mission-Wide Agricultural Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP). It should be noted that this PERSUAP evaluates pesticides that may be used in key crops that the strengthening livelihoods and resilience will promote.

In compliance with Executive Order 13677 "Climate-Resilient International Development," and consistent with sound impact assessment, this IEE specifically addresses climate risk considerations to integrate them into decision-making and project implementation.

Climate risk and resilience considerations are an integral part of the IEE; the team considered possible climate risk scenarios and vulnerabilities and assessed their potential impact. The IEE bases its analysis on DRC Climate Risk profile (<https://www.climatelinks.org/resources/climate-risk-profile-democratic-republic-congo>).

1.2 PROJECT/ACTIVITY OVERVIEW

The purpose of Children and Youth Education Response Activity (CYERA) is to assist Crisis- and conflict-affected Congolese children and youth to acquire foundational skills through responsive basic education opportunities.

CYERA will target children and youth (both girls and boys) living in crisis- and conflict-affected areas of DRC provinces of Ituri, North Kivu, South Kivu, and Kasai Central, with capacity to deliver rapid basic education response services in the provinces of Kasai, Kasai Oriental and Tanganyika.

Context/Background

The Democratic Republic of the Congo (DRC) is the fifth most fragile state in the world, with a humanitarian context characterized by recurrent pattern of conflict and displacement, exacerbated by epidemic outbreaks and natural disasters. Prolonged conflict in certain parts of the DRC is complex, with ethnic, international, and financial interests at play at different levels, including local, national and regional. These interests, compounded by poor governance, often leave local populations subject to the tyranny of warlords and armed groups that have taken advantage of the opportunity presented by the lack of rule of law.

Problem Statement & Resiliencies

As a result of recurrent crises (e.g. armed conflict, health emergencies, and natural disasters), Congolese children and youth, particularly the most marginalized, face multiple barriers to acquiring foundational skills:

- Education access is delayed, interrupted and/or curtailed.
- Schools fees limit the number of children who enroll in, stay in, and complete a full cycle of basic education, especially for the poorest and displaced families.
- School infrastructure is poor, under attack, and/or inadequate to keep students, teachers, and school personnel safe and protected from harm.
- Teachers lack the skills and receive limited support to deliver quality instruction.
- Large equity gaps exist, both in terms of access and learning outcomes.
- Alarming rates of child marriage, early pregnancy, and gender-based violence contribute to high drop out among adolescent girls.
- Education actors have limited crisis preparedness capacity and thus education response efforts are delayed, leading to significant gaps in education.

Despite these barriers, there is a strong value for education in Congo, and when resources and education opportunities are available, families prioritize education for their children, both girls and boys. Education is widely perceived as protective and provides a pathway out of cycles of poverty, conflict and instability. At the same time, there is a long history of investment in the Congolese education sector that can be leveraged, including well-established humanitarian and development coordination architectures, as well as well-established religious networks and a nascent private sector responding to educational needs. Finally, the new Congolese government has identified improving education as a key priority.

1.3 /ACTIVITY DESCRIPTION

TABLE 2: DEFINED OR ILLUSTRATIVE PROJECTS/ACTIVITIES AND SUB-ACTIVITIES

IR 1: Increased access
Activity 1: Community mobilization and empowerment of school governance actors for safe learning environments This activity aims to improve the safety of the learning environment through community participation, empowerment or 'bottom-up school governance' approaches, while encouraging Parental support and monitoring in schools and engaging families and communities to combat harmful social norms around safety and girls' rights. Additionally, assisting teachers and school staff in developing positive discipline approaches and clear, transparent accountability structures for when abuses do occur, implementation of child-friendly and confidential reporting mechanisms to link children to local child protection systems and follow up services when they experience violence, are also included.
Activity 2: Capacity building of local education and child protection actors for crisis preparedness and responsiveness This activity will increase the capacity of local education and child protection actors to prepare, plan and respond to the education needs of crisis-affected children and youth. The crisis preparedness and response efforts are intended to mitigate the disruption of education services for crisis-affected children and youth, or accelerate the resumption of education services, so that children and youth are protected and able to acquire life-saving and life-sustaining knowledge and skills. Preparedness and planning must be data-driven, coordinated with other actors and, whenever possible, sequenced or layered with response efforts from other sectors (OFDA, FFP, FtF, etc.) in order to optimize results. Such efforts will ensure that USAID's education investments are not lost when a new crisis or conflict hits. Given the scale, frequency and likelihood of crises in DRC, partners will work closely with USAID staff to prioritize education response efforts. This activity is limited to training. However, activities promoted by this training include school rehabilitation after crisis and income generating activities.

Activity 3: Implementation of crisis response plans

See activity 2. However, Activity 3 is not limited to capacity building but may include technical assistance for implementation of responses such as school refurbishment and small grant to community.

Activity 4: Civil society capacity building for enhanced delivery of non-formal education services

This activity will support local civil society organizations to expand the reach or absorption capacity of non-formal, alternative basic education opportunities for out-of-school youth. This may include accelerated education programs; catch-up, tutoring or other remedial education support; or functional literacy and numeracy.

Activity 5: Household grants or support to income generating activities.

This activity aims to increase parents' financial capacity to afford education-related expenses.

IR2: Improved delivery of quality, gender- and crisis-responsive foundational skills instruction

Activity 1: Teacher training

This training will improve teacher's competencies in foundational skills instruction and crisis-specific content.

Activity 2: Printing and distribution of teaching and learning materials (TLMs)

USAID will support that locally-developed, linguistically appropriate teaching and learning materials (TLMs) are available and used in the classroom. USAID will also ensure that supported programs use teaching and learning materials developed with prior USAID or other donor assistance, aligned to the National Basic Education Curriculum (*Programme Nationale de l'Enseignement Primaire*), and procured through the local market.

Activity 3: Psychosocial support for improved teacher well-being

This activity aims to support programs that sustain and expand the reach of teacher professional development and school-based coaching and support for teachers in crisis-affected areas. Given the adverse experiences that crisis-affected children and youth are or have experienced and the impact of chronic poverty on child development, teacher professional development must adequately prepare individuals to support the wellbeing of learners and build skills that help them be more resilient.

2.0 BASELINE ENVIRONMENTAL INFORMATION

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

.Geography

The Democratic Republic of Congo possesses the second largest rainforest in the world (the first being the Amazon). Rainforest covers most of the Congo River basin, central, and western regions. The Congo River runs some 4,398 km, and it is navigable for about 1,448 km of its basin. The south and southwest of this area is surrounded by plateaus merging into savannas. To the west we can find mountainous terraces and dense grasslands extending beyond the Congo River to the north.

In the east, the land rises into plateaus with heights more than 1,500 m, which forms the mountains of the Great Rift Valley with its volcanic origins and glaciated formations. There is an important system of lakes at the country's eastern borders: lakes Albert, Edward Kivu, Mweru and Tanganyika.

Climate and Rainfall

The climate is equatorial, hot and humid all year round with no dry season, in the central area crossed by the equator where there is a vast rainforest; or tropical, hot all year round but with a dry season, usually of short duration, in both the areas north and south of the equator. The dry season occurs in opposite periods, from December to February (boreal winter) north of the equator, and from June to September (austral winter) south of the equator.

The rains occur in the form of downpour or thunderstorm—the DRC is the country that receives the greatest number of lightning strikes in the world—usually in the afternoon, all year round in the equatorial zone, and in the long rainy season in the two tropical areas.

The country is largely occupied by the Congo River basin and its tributaries. Most of the country is located at an altitude of 300 to 800 meters above sea level. In some areas, such as the southeast, the altitude ranges from 800 to 1,300 meters, while in the easternmost part, near the Rift Valley lakes, there are also high mountain ranges. Rainfall averages between 1,000 and 1,700mm per year depending on the region.

Soil

The Congo River, including its 1,336,000square-mile (3,460,000square-km) basin, is the country's largest drainage system. The river rises in the high Katanga plateaus and flows north and then south in a great arc, crossing the equator twice. The lower river flows south-westward to empty into the Atlantic Ocean below Matadi. Along its course, the Congo passes through alluvial lands and swamps and is fed by the waters of many lakes and tributaries. The most important lakes are Mai-Ndombe and Tumba; the major tributaries are the Lomami, Aruwimi, and Ubangi rivers and those of the great Kasai River system. In addition, the Lukuga River links the basin to the Western Rift Valley.

Soils are of two types: those of the equatorial areas and those of the drier savannah (grassland) regions. Equatorial soils occur in the warm, humid lowlands of the central basin, which receive abundant precipitation throughout the year and are covered mainly with thick forests. This soil is almost fixed in place because of the lack of erosion in the forests. In swampy areas the very thick soil is constantly nourished by humus, the organic material resulting from the decomposition of plant or animal matter. Savannah soils are threatened by erosion, but the river valleys contain rich and fertile alluvial soils. The highlands of the Great Lakes region in eastern Congo are partly covered with rich soil derived from volcanic lava. This is the country's most productive agricultural area¹

Forests

About 45 percent of DRC is covered by primary forest which provides refuge for several large mammal species driven to extinction in other African countries. Overall, the country is known to have more than 11,000species of plants, 450 mammals, 1,150 birds, 300 reptiles, and 200 amphibians.

The greatest threats to DRC forests are subsistence and plantation agriculture, fuel wood collection, poaching, increased logging, mining, and hydroelectric projects. The DRC has 13 percent of the world's hydroelectric potential, and infrastructure investments could rapidly drive new development, which has been stymied over the past 30 years by impassable roads, failing electricity grids, and crumbling transportation systems².

¹ <https://www.britannica.com/place/Democratic-Republic-of-the-Congo>

² <http://rainforests.mongabay.com/20zaire.htm>

While overall national deforestation rates remain relatively low (estimated at 0.2 per cent per annum), in some parts of the country, notably in savannah and gallery forests and especially around urban centers, it is reaching high levels and posing a direct threat to drinking water sources³.

Water resources and Irrigation

In the DRC's administratively fragile context, uncontrolled land development activities pose a fundamental threat to strategic drinking water sources. Weak land-use planning and inadequate protection of critical water sources at all levels, from village springs to the intakes of water treatment plants, represent a direct risk to ongoing efforts to achieve MDG and PRSP water targets. The long-term sustainability of water infrastructure investments is frequently jeopardized by the resultant environmental degradation, exemplified by the Lukunga water treatment plant in Kinshasa. Given the urgency of the situation, interim priority measures need to be taken, namely securing the land area surrounding drinking water sources and implementing source-management plans at the micro-watershed level. More broadly, increasing deforestation and degradation of forest ecosystem services represents a direct threat to local community water supply and attainment of national and MDG water targets. This is particularly the case in rural areas, where more than 90 percent of the population depends on springs located in dense forests (both gallery and rainforest) 13.

Despite its immense freshwater resources, the overriding challenge for the DRC's water sector is to improve its rapidly growing population's access to safe drinking water. At least two decades of underinvestment, aggravated by conflict-related destruction of facilities, have left the country's water infrastructure and services in a serious state of deterioration. Consequently, water access rates have undergone a dramatic decline from pre-conflict 1990 levels; the DRC's current rate of around 26 per cent is one of the lowest in Sub-Saharan Africa. It is also significant that the enormous death toll from the "Congo wars" is mainly attributable to indirect public health effects, including inter alia those linked with the collapse of water and sanitation services.¹⁵

Possessing an estimated 52 percent of Africa's surface water reserves (rivers, lakes, and wetlands), the DRC is the most water-rich country in Africa. Furthermore, the DRC alone accounts for an estimated 23 percent of Africa's internal renewable water resources. Endowed with an average annual precipitation of around 6,000 billion m³, rainfall is regular and abundant (averaging 1,545 mm/year) but varies in space and time (800–1,800mm). The DRC also enjoys considerable water autonomy, with 70 percent (900km³/yr) of its total actual renewable water resources (estimated at 1,283 km³/year) generated internally from rainfall. The country's bountiful water resources are intrinsically linked to its vast forests, which extend over 155.5 million ha. Indeed, the vast majority of the population depends on springs located in dense forests (both gallery and rainforest), highlighting the importance of forest ecosystem services to local community water supplies.

³ 14http://postconflict.unep.ch/publications/UNEP_DRC_water.pdf

Activity specific Geographic scope

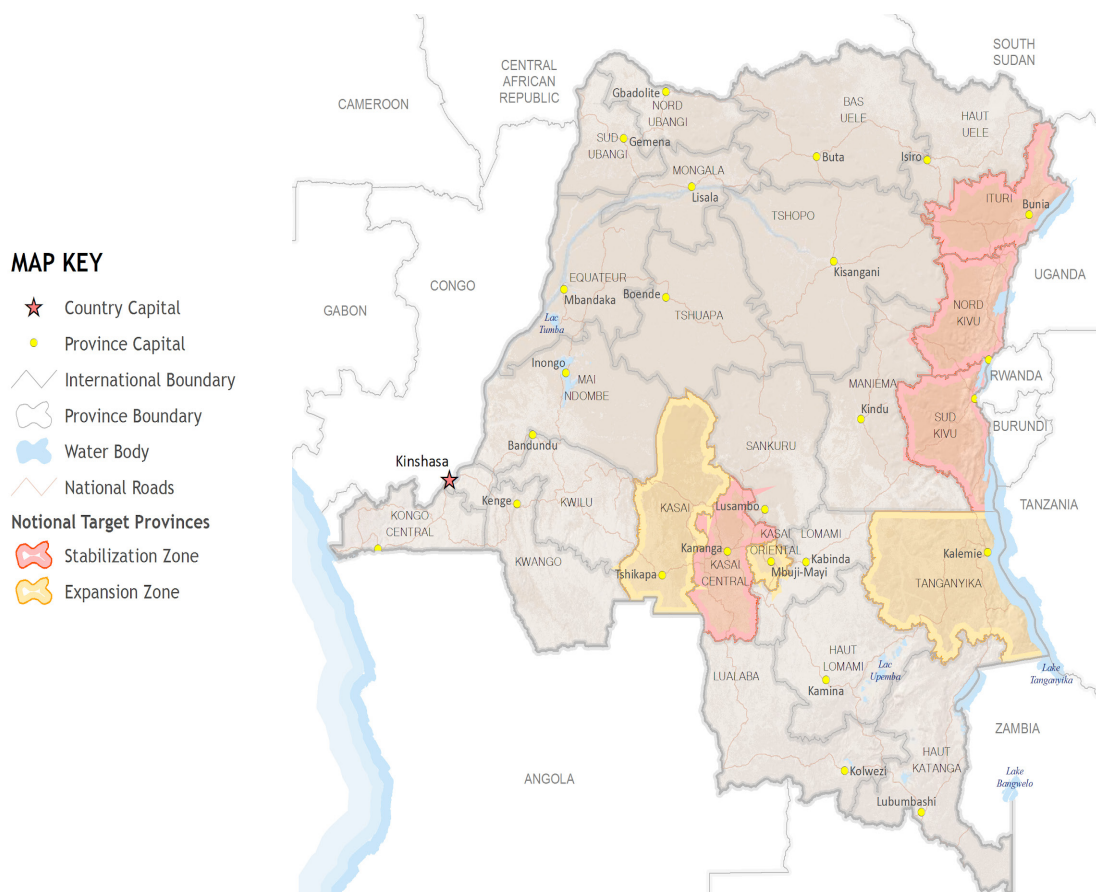


Image 1: Activity implementation areas

Core implementation: Ituri, North Kivu, South Kivu, Kasai Central

Response capacity for acute crises: Kasai, Kasai Oriental, Tanganyika

Climatic summary

Meteorological observations across the DRC are scarce and offer limited information on the country's climate variability, but three major climatic zones are recognized (see map and descriptions below).

Zone 1 – (South Kivu and parts of Kasai and Tanganyika) Tropical rainforests along the Congo River and its tributaries characterized by two rainy seasons, occurring from March–May and September–December, followed by two short dry seasons in June–August and January–February. Average temperatures range from 24–25°C with limited variability throughout the year.

Zone 2 – (parts of Kasai) Mountainous terraces and dense grasslands with predominantly tropical wet and dry climates and a dedicated rainy season (July–August). Average temperatures range from 24–25°C with limited variability throughout the year.

Zone 3 – (parts of Kasai and Tanganyika) Subtropical climates of savannas in the south and southeast with a single rainy season occurring between December–February. Slightly lower but consistent temperatures range from 22–23°C.

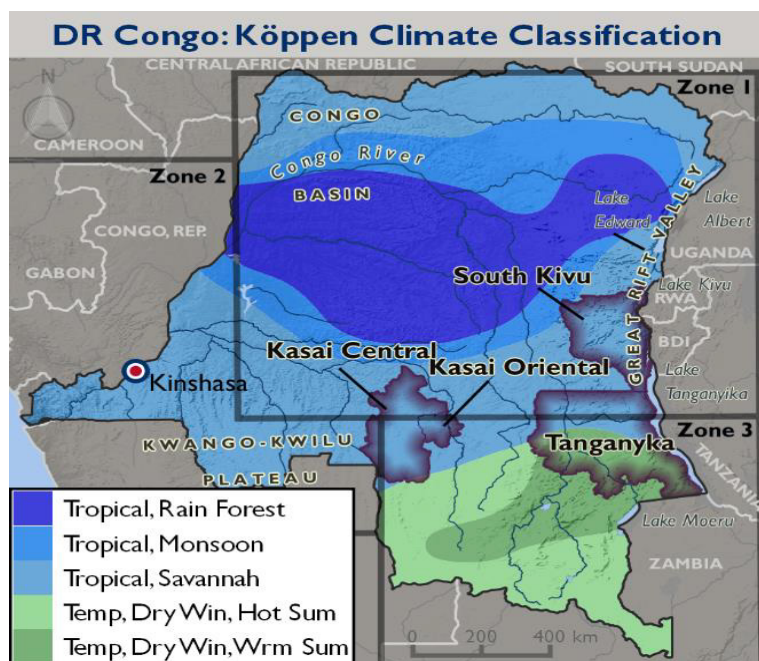


Image 2: DRC Koppen Climate Classification

2.2 APPLICABLE AND APPROPRIATE PARTNER COUNTRY AND OTHER INTERNATIONAL STANDARDS (E.G. WHO), ENVIRONMENTAL AND SOCIAL LAWS, POLICIES, AND REGULATIONS

Environmental law

DRC's most recent constitution, which came into effect on February 18, 2006 established the following in Article 53: every person has a right to a healthy environment; the environment must be protected; and the state is responsible for protecting the environment and the health of the people. The constitution also mandated laws to be written for the protection of the environment and tourism, for cooperative governance between central and provincial administration to protect and conserve the environment, natural sites and landscapes. Development projects and planning in the DRC are commanded by the December 2006 ministerial decree n°043/CAB/MIN/ECN-EF/2006, which requires an Environmental and Social Impact Assessment (ESIA) for all development projects. Law No. 11/009 for the Basic Fundamental Principles Relating to Environmental Protection, promulgated in 2011, is the regulatory framework requiring that developers of mining, industrial, commercial, agricultural, forestry, and telecommunications projects complete an ESIA and undertake participative public consultation.

Decree No. 14/019 dated August 02, 2014 set the rules on the functioning and the procedural mechanisms of the protection of the environment. A national agency named (Congolese Agency for Environment) has been created and has the mission to manage the EIA implementation in DRC. In collaboration with all related services, the Agency shall develop and makes available to the public the Operations Manual and Implementation Procedures for environmental and social impact studies. The manual is not yet available.

Law No. 11/009 regulates management and conservation of natural resources and the prevention of risks and control of pollution and other public nuisances. It holds the state responsible for the conservation and sustainable management of ecosystems, natural resources, and monuments, and specifically aims to prevent the degradation of land, soil and vegetation, as well as surface and groundwater. Sustainable management of biodiversity and forests, prohibition of activities that will negatively affect the environment in forbidden zones or protected areas are also regulated by this law.

DRC is member of Convention on International Trade in Endangered Species (CITES) (1975) for the conservation of threatened wildlife and plants, World Heritage Convention (1975), the African Convention on nature and natural resource conservation (1976), the Convention on Biological Diversity (1992), the Ramsar Convention (1994) for the protection of important wetlands, the UN Framework Convention on Climate Change, and the Central African Forestry Commission

Land tenure code

The official land regime applicable in the DR-Congo is Act No. 80-008 of 18 July 1980 amending and supplementing Act No. 73-021 of 20 July 1973 on the general regime of property, land tenure, real estate and security regime. However, this law is faced with problems such as:

- the uncontrolled subdivision of land by rights-holders in defiance of the law;
- reallocation of abandoned concessions, formerly owned by expatriates and / or acquirers;
- And the tacit renewal of undeveloped land after the statutory time limit.
- The customary system, based on matrilineal system, is imposed in the rural areas, with the exception of the urban peripheries and the most commercial road sections.

Right to Education

Basic education is legally a right in the DRC that should be free of charge, pursuant to both the DRC Constitution and the 2014 framework law on national education. However, the failure of the state to fund education means that most children can only attend if their families directly fund the cost of their enrollment/attendance, or if they are able to access educational assistance through charity or development/humanitarian programming⁴. The free primary education policy (2010) has never been fully implemented.

Gender

1. National and international actors have placed a strong priority on promoting girls' access to education as part of emergency response and post-conflict recovery initiatives in DRC. The government has developed an institutional framework intended to address gender concerns, including the Constitution of the DRC, the Family Code of 1981, the Law on Child Protection (2009), Convention on the Elimination of Discrimination Against Women (CEDAW), the National Policy on Gender Equality and the National Strategy Against Sexual and Gender-Based Violence, and the Law on Sexual Violence (2006).

A new Education Sector Strategy for 2016 to 2025 was adopted in December 2015. The new Education Sector Strategy contains a specific section devoted to gender equality. The strategy promises to improve conditions within schools to help the retention of girls within the system, and to provide them with the best conditions in which to complete their schooling and achieve the best results possible. Specifically, the strategy promises to support:

- The construction of dedicated latrines for girls in schools and the provision of running water to help girls cope with the need for general hygiene such as hand washing but more specifically focused on, menstrual hygiene awareness and management (MHM);
- Measures to be put in place to ensure security for girls within schools and in the close environment around the school;
- Measures to favor the recruitment and retention of women teachers;
- Scholarships to be awarded to girls from the poorest and most vulnerable families; and

⁴ Ferf, A., Hilhorst, D., and Weijs, B. (2012). Livelihoods, basic services and social protection in Democratic Republic of Congo (Working Paper 2). Retrieved from Overseas Development Institute (ODI): <https://www.odi.org/sites/odi.org.uk/files/odi-assets/publications-opinion-files/7717.pdf>.

- A communication campaign to be implemented in collaboration with the Ministry of Gender on women's rights and on the legal sanctions which exist for acts of violence against women and girls .
2. While the government has established gender focal points in all the provinces to support implementation of the National Policy on Gender, on-the-ground research suggests that the Ministry has neither the capacity, resources, nor the political leverage in government to turn policy into practice throughout the country (Chemonics, 2015).

3.0 ANALYSIS OF POTENTIAL ENVIRONMENTAL RISK and RECOMMENDED MITIGATIONS

The mitigation measures presented in this section constitute the minimum required based on available information at the time of this IEE and the environmental analysis. These measures shall provide general direction for completing the project/activity Environmental Mitigation and Monitoring Plan (EMMP).

TABLE 3. POTENTIAL IMPACTS – PROJECT/ACTIVITY 1

	Potential environmental and social impacts	Recommended Mitigations
IR 1: Increased access to responsive basic education services		
Activity 1: Community mobilization and empowerment of school governance actors for safe learning environments	This activity consists of training; as such this activity is not expected to have significant impact on the environment.	N/A
Activity 2: Capacity building of local education and child protection actors for crisis preparedness and responsiveness	This activity consists of training; as such this activity is unlikely to have significant impact on the environment. However, the activities promoted by this training (e.g school rehabilitation after crisis, income generating activities that could put high pressure on natural resources) may cause negative effects on the environment: inappropriate waste management, hazardous risk on human health, procurement of material in sensitive areas, water pollution	While training itself does not introduce negative environmental impacts, the techniques that are promoted could negatively impact the environment thus. Training should include environmental risk related to the promoted activities: - Avoid sourcing material from sensitive or protected area - Ensure community involvement in mitigation and monitoring - Encourage income generating activities that promote environmental protection and inform community on prohibited activity by National and USA laws - Encourage good waste management

		Environmental risk related to specific crop could be found at http://www.usaidgems.org/SectorResources/agAndEnv.htm Environmental risk related to school rehabilitation can be found at https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/sector-environmental-guidelines-resources#sc.
Activity 3: Implementation of crisis response plans (which could include school refurbishments, small grants to local communities, etc.)	Crisis responses can present a risk on the environment. Those risks may be variable depending on the nature of the responses: - Construction: Erosion, human health hazards, land degradation, water stagnation that may lead to breeding habitat for mosquitoes, waste management concern - Small grants: May contribute to illegal or activity that deteriorate the environment	For any crisis responses which is not exempted or categorically excluded as per 22 CFR216, an ERF must be submitted for approval by USAID. The <i>AFR Environmental Review Form</i> (available at http://www.usaidgems.org/Documents/ComplianceForms/AFR/AFR-EnvReviewForm-20Dec2010.doc) must be completed and approved prior to the provision of grants to local groups. Environmental risk related to specific crop could be found at http://www.usaidgems.org/SectorResources/agAndEnv.htm Environmental risk related to school rehabilitation can be found at https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/sector-environmental-guidelines-resources#sc. Environmental risk related to school construction can be found at https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/sector-environmental-guidelines-resources#co.
Activity 4: Civil society capacity building for enhanced delivery of non-formal education services	This activity consists of training; as such this activity is not expected to have significant impact on the environment.	N/A

Activity 5: Household grants or support to income generating activities for increased parents' financial capacity to afford education-related expenses	While Household Grants to parent do not introduce negative environmental impacts, grants could be used in ways that could negatively impact the environment. Refer to Activity IR1.3	IP shall ensure that all grants are subjected to a formal Environmental Screening & Review Process: http://www.usaidgems.org/Documents/ComplianceForms/AFR/AFR-EnvReviewForm20Dec2010.doc . (Annex 1) • The IP is responsible for ensuring that the recipients have the capacity to incorporate environmental considerations into their activity. IP must monitor use of grants and ensure USAID funds are not used for any purpose listed in the "Limitations" section of this IEE (Section 6.0) IP should "Nudge" beneficiaries to avoid spending household grants in ways that might jeopardize natural resources.
IR2:Improved delivery of quality, gender- and crisis-responsive foundational skills instruction		
Activity 1: Teacher training	This activity consists of training; as such this activity is not expected to have significant impact on the environment.	N/A
Activity 2: Printing and distribution of teaching and learning materials (TLMs)	This activity is not expected to have significant impact on the environment.	N/A
Activity 3: Psychosocial support for improved teacher well-being	This activity consists of training; as such this activity is not expected to have significant impact on the environment.	N/A

4.0 ENVIRONMENTAL DETERMINATIONS

4.1 RECOMMENDED ENVIRONMENTAL DETERMINATIONS

This IEE for strengthening livelihoods and resilience recommend Categorical Exclusions and Negative Determination with Conditions for the activities planned under this program as summarized in the table below.

TABLE 4. RECOMMENDED ENVIRONMENTAL DETERMINATIONS

Projects/Activities	Categorical Exclusion (CE) Citation (if applicable)	Negative Determination with Conditions (NDC)	Positive Determination	Deferral
IR 1: Increased access to responsive basic education services				
Activity 1: Community mobilization and empowerment of school governance actors for safe learning environments	22 CFR 216.2(c)(2)(i)			
Activity 2: Capacity building of local education and child protection actors for crisis preparedness and responsiveness		22 CFR 216.3(a)(iii)		
Activity 3: Implementation of crisis response plans (which could include school refurbishments, small grants to local communities, etc.)		22 CFR 216.3(a)(iii)		
Activity 4: Civil society capacity building for enhanced delivery of non-formal education services	216.2(c)(2)(i)			
Activity 5: Household grants or support to income generating activities for increased parents' financial capacity to afford education-related expenses		22 CFR 216.3(a)(iii)		
IR2: Improved delivery of quality, gender- and crisis-responsive foundational skills instruction				
Activity 1: Teacher training	216.2(c)(2)(i)			
Activity 2: Printing and distribution of teaching and learning materials (TLMs).	216.2(c)(2)(i)			
Activity 3: Psychosocial support for improved teacher well-being	216.2(c)(2)(i)			

4.2 CLIMATE RISK MANAGEMENT

DRC's vast territory, including inland lakes, mountains, grassland savanna, and tropical and highland forests, spans multiple climate classifications that can be grouped into three zones Landscapes

TABLE 5. DRC Climate Zones

Zone 1: North & South Kivu, Ituri, northern portions of Kasai, Central Kasai and Tanganyika	Tropical rainforests along the Congo River and its tributaries characterized by two rainy seasons (March–May and September–December), followed by two short dry seasons (June–August and January–February)	Averages range from 24–25°C; limited variability throughout the year
Zone 2: Kinshasa, southern Kasai and southwestern Kasai Central	Mountainous terraces and dense grasslands with predominantly tropical wet and dry climates and a dedicated rainy season (July–August)	Averages range from 24–25°C; limited variability throughout the year
Zone 3: Southeastern Kasai Central, Kasai Oriental, Haut Katanga and southern Tanganyika	Subtropical climates of savannas in the south and southeast with a single rainy season occurring between December–February	Slightly lower but consistent temperatures range from 22–23°C

Table 6. Activity Climate Risk Management Summary Table

Defined or Anticipated Project Elements ⁵	Climate Risks ⁶	Risk Rating ⁷	How Risks are Addressed at Project Level ⁸	Further Analysis and Actions for Activity Design/ Implementation ⁹	Opportunities to Strengthen Climate Resilience ¹⁰
For all CRM measures below Incorporate results of climate risk screening into solicitation, annual work planning, and MEL plans					
IR 1: Increased access to responsive basic education services	Rising temperatures : The rise in	Moderate	Adapt training, workshop and meeting or other activities hours to accommodate	Incorporate results of climate risk screening into solicitation, annual	Identify the opportunities from the activity to leverage

⁵ Purpose/Sub-purpose, Area of Focus, or Activity/ Mechanism, etc.

⁶ List key risks related to the project elements identified through either the strategy- or project-level climate risk assessment.

⁷ Low/Moderate/High

⁸ Describe how risks have been addressed at the project level. If a decision has been made to accept the risk, briefly explain why.

⁹ Describe CRM measures to be integrated into activity design or implementation, including additional analysis, if applicable.

¹⁰ Describe opportunities to achieve development objectives by integrating climate resilience or mitigation measures.

Activity 1: Community mobilization and empowerment of school governance actors for safe learning environments Activity 2: Capacity building of local education and child protection actors for crisis preparedness and responsiveness Activity 4: Civil society capacity building for enhanced delivery of non-formal education services IR2: Improved delivery of quality, gender- and crisis-responsive foundational skills instruction Activity 1: Teacher training Activity 3: Psychosocial support for improved teacher well-being	temperature can increase the temperature inside the training room and create learning environment that is uncomfortable (make it difficult to focus and learn) as well as difficult to travel long distances to attend the training especially in hot and humid environment. Increased frequency of intense rainfall: Increased frequency of intense rainfalls may damage facilities, prevent access to facilities, or cause		women who have to travel long distances or work on additional hours to look for clean water and other livelihood resources. Encourage the use of resistant infrastructure for training, workshop or meeting that: - Could withstand increased and intense rainfall. - have openings or aeration system that allows adequate indoor temperature; sensitize community on the importance as well as the need of drinking water to keep hydrated and provide drinking water during rising temperatures period. Inform communities about climate-related risks and direct them toward trusted weather information.	work planning, and MEL plans Training, workshop and meeting facilities should be selected based on safety criteria including low landslide risk. Existing training, workshop or meeting facilities should be monitored on a regular basis for signs of erosion which could lead damage on production and human health.	other activities (Gender violence activities; WASH, community empowerment, social and weather forecast activities). Work with the appropriate minister and update on the community's stressor (landslide, flooding, rising temperature) During different climate risk scenario. Create awareness and disseminate climatic information (early warning systems), helping participants plan for possible climate change events
---	---	--	---	---	--

	students to miss school because they have to help with home related task. Prolonged dry Spells: Prolonged dry spells may create a situation where students need to help more at home (especially woman who need to walk long distance to look for water) and can't attend training session, they might also limit access to water at facilities. Increased extreme weather and floods				
IR 1: Increased access to responsive basic education services Activity 3: Implementation of	This activity is not well defined yet, an activity level CRM shall be completed by the IP and submitted to USAID for approval prior to activity implementation.				

crisis response plans (which could include school refurbishments, small grants to local communities, etc.)					
Activity 5: Household grants or support to income generating activities for increased parents' financial capacity to afford education-related expenses					
IR2: Improved delivery of quality, gender- and crisis-responsive foundational skills instruction Activity 2: Printing and distribution of teaching and learning materials (TLMs)	Rising temperatures	Moderate	Adapt distribution period to avoid as possible rising temperature hours/period. The transportation means for distribution should allow keeping adequate temperature inside. Sensitize involved persons on the importance as well as the need of drinking water to keep hydrated and provide drinking water during rising temperatures period. Adapt distribution hours to accommodate women who may have to travel more to look for clean water (as the quantity of drinking water may increase) . Inform communities about climate-related risks and direct them toward trusted weather information.	Plan ahead the distribution period to avoid rising temperature hours/period Support communities to include specific measures to protect particularly women and children during period of rising temperature.	Identify the opportunities from the activity to leverage other activities (WAH, Gender, community, empowerment, weather forecast activities). Work with the appropriate minister and update on the community's stressor (landslide, flooding, rising temperature) During different climate risk scenario. Create awareness and disseminate climatic information (early warning systems), helping participants plan for possible climate change events
	Increased frequency of intense	High	Increased frequency of Intense rainfall could make distribution areas	Plan ahead the distribution period to avoid high rainfall	Encourage low cost delivery 'activities

	rainfall Increased extreme weather and floods Prolonged dry spells		inaccessible. Adapt distribution period to avoid intense rainfall season period. Change the method for delivering (Foot, bicycle, Bike) Cover the material with waterproof cover. Provide human protective equipment. Adapt distribution hours to accommodate women who have to travel long distance to look for clean water (as sources may be flooded) and other resources for livelihood during extreme weather and floods. Inform communities about climate-related risks and direct them toward trusted weather	season that make road inaccessible. Make available other transportation means adequate to inaccessible road by vehicles. Design the TLMs materials in a way that resist to humidity. Supporting communities to include specific measures to protect particularly women and children during period of scarce clean water resources and help the communities to protect their livelihood resources and income generating activities in case of disasters, unfavorable climate season	Identify the opportunities from the activity to leverage other activities (Wash, Agriculture, Health community, empowerment, weather forecast activities). Work with the appropriate minister and update on the community's stressor (landslide, flooding, rising temperature) During different climate risk scenario. Create awareness and disseminate climatic information (early warning systems), helping participants plan for possible climate change events
--	---	--	---	--	---

5.0 CONDITIONS AND MITIGATION MEASURES

5.1 CONDITIONS

The environmental determinations in this IEE are contingent upon full implementation of the following general implementation and monitoring requirements, as well as ADS 204 and other relevant requirements.

5.1.1 During Pre-Award:

- 5.1.1.1 Pre-Award Briefings: As feasible, the design team and/or the cognizant environmental officer(s) (e.g., MEO, REA, BEO) will provide a pre-award briefing for potential offerors on environmental compliance expectations/responsibilities at bidders' conferences.
- 5.1.1.2 Solicitations: The design team, in coordination with the A/CO, will ensure solicitations include environmental compliance requirements and evaluation criteria. A/CO will ensure technical and cost proposal requirements include approach, staffing, and budget sufficient for complying with the terms of this IEE.
- 5.1.1.3 Awards: The A/COR, in coordination with the A/CO, will ensure all awards and sub-awards, include environmental compliance requirements.

5.1.2 During Post-Award:

- 5.1.2.1 Post-Award Briefings: The A/COR and/or the cognizant environmental officer(s) (e.g., MEO, REA, BEO) will provide post-award briefings for the IP on environmental compliance responsibilities.
- 5.1.2.3 Workplans and Budgeting: The A/COR will ensure the IP integrates environmental compliance requirements in work plans and budgets to comply with requirements, including EMMP implementation and monitoring.
- 5.1.2.4 Staffing: The A/COR, in coordination with the IP, will ensure all awards have staffing capacity to implement environmental compliance requirements.
- 5.1.2.5 Records Management: The A/COR will maintain environmental compliance documents in the official project/activity file and upload records to the designated USAID environmental compliance database system.
- 5.1.2.6 Host Country Environmental Compliance: The A/COR will ensure the IP complies with applicable and appropriate host country environmental requirements unless otherwise directed in writing by USAID. However, in the case of a conflict between the host country and USAID requirements, the more stringent shall govern.
- 5.1.2.7 Work Plan Review: The A/COR will ensure the IP verifies, at least annually or when activities are added or modified, that activities remain within the scope of the IEE. Activities outside of the scope of the IEE cannot be implemented until the IEE is amended.
- 5.1.2.8 IEE Amendment: If new activities are introduced or other changes to the scope of this IEE occur, an IEE Amendment will be required.
- 5.1.2.14 USAID Monitoring Oversight: The A/COR or designee, with the support of the cognizant environmental officer(s) (e.g., MEO, REA, BEO), will ensure monitoring of compliance with established requirements (e.g., by desktop reviews, site visits, etc.).

- 5.1.2.16 Environmental Compliance Mitigation and Monitoring Plan: The A/COR will ensure the IP develops, obtains approval for, and implements Environmental Mitigation and Monitoring Plans (EMMPs) that are responsive to the stipulated environmental compliance requirements.
- 5.1.2.17 Environmental Compliance Reporting: The A/COR will ensure the IP includes environmental compliance in regular project/activity reports, using indicators as appropriate; develops and submits the Environmental Mitigation and Monitoring Reports (EMMRs); and completes and submits a Record of Compliance (RoC) describing their implementation of EMMP requirements in conjunction with the final EMMP or at the close of sub activities (as applicable). And where required by Bureaus or Missions, ensure the IP prepares a closeout plan consistent with contract documentation for A/COR review and approval that outlines responsibilities for end-of-project operation, the transition of other operational responsibilities, and final EMMP with lessons learned.
- 5.1.2.18 Corrective Action: When noncompliance or unforeseen impacts are identified, IPs notify the A/COR, place a hold on activities, take corrective action, and report on the effectiveness of corrective actions. The A/COR initiates the corrective action process and ensures the IP completes and documents their activities. Where required by Bureaus or Missions, ensure Record of Compliance is completed. 5.2 AGENCY CONDITIONS
- 5.2.1 Sub-contract Screening: The A/COR will ensure the IP uses an Environmental Screening Tool to screen any sub-grant applications and to add in the development of EMMPs.
- 5.2.2 Other Supplemental Analyses: The A/COR will ensure supplemental environmental analyses that are called for in the IEE are completed and documented prior to the implementation of the related activity for which the analyses are completed.

6.0 LIMITATIONS OF THIS INITIAL ENVIRONMENTAL EXAMINATION

The determinations recommended in this document apply only to projects/activities and sub-activities described herein. Other projects/activities that may arise must be documented in either a separate IEE, an IEE amendment if the activities are within the same project/activity, or other type of environmental compliance document and shall be subject to an environmental analysis within the appropriate documents listed above.

In addition, other than projects/activities determined to have a pesticide management plan (PERSUAP), it is confirmed that the projects/activities described herein do not involve any actions listed below. Any of the following actions would require additional environmental analyses and environmental determinations:

- Support project preparation, project feasibility studies, or engineering design for activities listed in §216.2(d)(1);
- Affect endangered and threatened species or their critical habitats per §216.5, FAA 118, FAA 119;
- Provide support to extractive industries (e.g. mining and quarrying) per FAA 117;
- Promote timber harvesting per FAA 117 and 118;
- Lead to new construction, reconstruction, rehabilitation, or renovation work per §216.2(b)(1);
- Support agro-processing or industrial enterprises per §216.1(b)(4);

- Provide support for regulatory permitting per §216.1(b)(2);
- Lead to privatization of industrial facilities or infrastructure with heavily polluted property per §216.1(b)(4);
- Procure or use genetically engineered organisms per §216.1(b)(1); and/or
- Assist the procurement (including payment in kind, donations, guarantees of credit) or use (including handling, transport, fuel for transport, storage, mixing, loading, application, clean-up of spray equipment, and disposal) of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials. Pesticides cover all insecticides, fungicides, rodenticides, etc. covered under the Federal Insecticide, Fungicide, and Rodenticide Act per §216.2(e) and §216.3(b).

7.0 REVISIONS

Per 22CFR216.3(a)(9), when ongoing programs are revised to incorporate a change in scope or nature, a determination will be made as to whether such change may have an environmental impact not previously assessed. If so, this IEE will be amended to cover the changes. Per ADS 204, it is the responsibility of the USAID A/COR to keep the MEO/REA and BEO informed of any new information or changes in the activity that might require revision of this environmental analysis and environmental determination.

ATTACHMENTS:

None.