

INITIAL ENVIRONMENTAL EXAMINATION

PROJECT/ACTIVITY DATA

Project/Activity Name:	FY19-23 Global Initial Environmental Examination (IEE) for Commodity Procurement, Capital Improvements, and Activities Involving Pesticides
Amendment (Y/N):	N
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Prepared by:	DCHA/ASHA		
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ENVIRONMENTAL COMPLIANCE REVIEW DATA

Analysis Type:	Initial Environmental Examination		
Environmental Determination(s):	Categorical Exclusion, Negative Determination,		
IEE Expiration Date:	Dec 31, 2023		
Additional Analyses/Reporting Required:	N/A		
Climate Risks Identified (#):	Low <u>2</u>	Moderate <u> </u>	High <u>3</u>
Climate Risks Addressed (#):	Low <u>N/A</u>	Moderate <u>N/A</u>	High <u>N/A</u>

THRESHOLD DECISION MEMO AND SUMMARY OF FINDINGS

PURPOSE AND SCOPE OF THE INITIAL ENVIRONMENTAL EXAMINATION

The purpose of the Global Office of American Schools and Hospitals Abroad (ASHA) Initial Environmental Examination (IEE)¹ is to provide a preliminary review of the reasonably foreseeable effects on the environment of the USAID intervention described herein and recommend determinations and, as appropriate, conditions, for these activities. This ASHA Global IEE is comprised of a signatory Facesheet, a high-level analysis of key activities, and templates. This ASHA Global IEE fulfills the pre-obligation requirements of Title 22, Code of Federal Regulations, Part 216 (22 CFR 216) and Automated Directives System (ADS) chapters 201 and 204. The ASHA Global IEE provides the following:

- a) Analysis of environmental impact and climate risk;
- b) Assignment of regulatory threshold determinations and climate risk ratings; and
- c) Conditions for environmental impact and climate risk management, monitoring, and reporting.

PROJECT/ACTIVITY SUMMARY

This IEE reviews three types of interventions conducted under USAID/ASHA: commodity procurement, capital improvements, and activities involving pesticides.

ENVIRONMENTAL DETERMINATIONS AND CLIMATE RISK RATINGS

TABLE I. ENVIRONMENTAL DETERMINATIONS AND CLIMATE RISK RATINGS

Projects/Activities	Recommended Environmental Threshold Decision	Recommended Climate Risk Rating
Education, training, and technical assistance, not including activities affecting the environment.	Categorical Exclusion, pursuant to 22 CFR 216.2(c)(2)	Low, as in ADS 201mal, Section 3
Procurement of commodities that <u>do not</u> contain hazardous materials.	Categorical Exclusion, pursuant to 22 CFR 216.2(c)(2)	Moderate, as in ADS 201mal, Section 4 ²
Procurement of commodities to include biomedical equipment and related hazardous materials.	Negative Determination	Moderate, as in ADS 201mal, Section 4
Small-scale construction and rehabilitation of facilities.	Negative Determination	High, as in ADS 201mal, Section 3
Procurement, use, transport, storage, or disposal of pesticides (requires Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP)).	Negative Determination	Moderate, as in ADS 201mal, Section 4

¹ The ASHA Global IEE was previously termed the ASHA Programmatic IEE (P-IEE)

² As mentioned in the USAID ADS 201mal, CRM is an iterative and adaptive process, where risks and risk ratings are reconsidered as new information on either programmatic approaches or expected climate impacts becomes available. Recommended "Moderate" risk ratings may therefore be modified to either High or Low depending on the project-specific context.

BEO-SPECIFIED CONDITIONS OF APPROVAL

The Agreement/Contract Officer's Representative (AOR) will ensure that ASHA implementing partners (IPs) will incorporate the following nine (9) requirements (more details provided in Section 5 of this ASHA Global IEE):

Condition 1: Adhere to ASHA Global IEE and Global Construction PERSUAP³ to develop proposal application.

Condition 2: Develop Environmental Capability Statement (ECS) as part of the project proposal application.⁴

Condition 3: Develop EMMP and CRM for all Commodity Procurements awards.

Condition 4: Develop IEE, EMMP and CRM for all Capital Improvement awards.

Condition 5: Develop project-specific Construction SUAP for all procurement and/or use of pesticides.

Condition 6: Respond to any gaps identified in the BEO Issues Letter

Condition 7: Conduct Environmental Reporting as part of ASHA QPRs.

Condition 8: Integrate Requirements into Sub-contracts for engineering, waste management, material sourcing, etc.

Condition 9: Adhere to Partner Country Regulations.

IMPLEMENTATION

In accordance with 22 CFR 216 and Agency policy, the conditions and requirements of this document become mandatory upon approval.

³ USAID Global Construction PERSUAP (2018): https://ecd.usaid.gov/document.php?doc_id=51716.

⁴ ECS template is available on the ASHA Google Drive as Annex A:
<https://drive.google.com/drive/folders/103ZUYH0jxuonKDUHBOCr0ShekwkwtRZD>.

USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

PROJECT/ACTIVITY NAME: ASHA GLOBAL INITIAL ENVIRONMENTAL EXAMINATION (ASHA Global IEE)

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I.0 PROJECT/ACTIVITY DESCRIPTION

I.1 PURPOSE AND SCOPE OF IEE

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

This ASHA Global IEE establishes the overall environmental compliance process for every ASHA project implemented around the world. The ASHA Global IEE serves as a pre-award decisional document, which will be subsequently supplemented and replaced by project-specific environmental compliance and CRM documentation developed by the ASHA implementing partner (IP), including the Environmental Capability Statement (ECS) that applicants submit with their pre-award application. The ECS describes their proposed approach to integrate environmental and climate risk management systems as part of the initial project design.

Post-award compliance documentation includes the supplemental project-specific IEEs and CRM screenings, Environmental Mitigation and Monitoring Plans (EMMPs), PERSUAPs and/or and Environmental Assessments (EAs). These project-specific, post-award analytical documents describe the project-specific environmental baselines, potential environmental impacts, and environmental mitigation measures, including how mitigations will be financed and monitored. Implementing partners will be responsible for submitting compliance documents to the ASHA Agreement Officer's Representative (AOR). If the IP has multiple similar ASHA activities, the IP may modify the existing IEE and/or EMMP to incorporate any additional impacts and mitigations required to address new activities or sites and indicate which ASHA activities are covered by the existing EMMP.

I.2 PROJECT/ACTIVITY OVERVIEW⁵

The Office of American Schools and Hospitals Abroad began in 1947 and was incorporated into USAID by the Foreign Assistance Act of 1961. Since its inception, USAID/ASHA has achieved a visible legacy by aiding approximately 300 institutions globally and aiding in the development of innovative and state-of-the-art schools, libraries, and medical centers in more than 80 countries. USAID/ASHA's record of contributing to and building connections with vibrant networks of civil society institutions extends through 26 U.S. Congresses and 18 presidential administrations. USAID/ASHA currently manages a worldwide portfolio of approximately 110 awards and is an invaluable complement to USAID's wide-ranging development work.

USAID/ASHA directly contributes to U.S. foreign policy and public diplomacy objectives by fostering strong civil society institutions and excellence in higher education and innovation. The networks of educational and medical institutions supported by USAID/ASHA offer opportunities to access quality education and health services in areas of the world where often few or none exist. USAID/ASHA has educated successive generations of global citizens and leaders, deepening their understanding of American ideas and practices. As institutions of learning, ASHA institutions provide a unique opportunity to showcase the latest approaches to integrating environmental and social impact concerns

⁵ Overview from <https://www.usaid.gov/work-usaid/business-funding/grant-programs/american-schools-and-hospitals-abroad>.

through public consultation from the development of capital improvement plans to the development of internal controls to ensure operational impacts are minimized.

I.3 PROJECT/ACTIVITY DESCRIPTION

This IEE considers three primary types of interventions financed through ASHA programs: commodity procurement, capital improvement, and activities involving pesticides.

Commodity Procurement: These involve the procurement of materials, resources, or equipment such as generators, computers, incubators, surgical instruments, furniture, and office supplies. Commodity procurement will ultimately generate three main categories of wastes: general, medical, and other hazardous wastes. Some commodity purchases require specific considerations at installation and during operations to ensure environmental impacts on the natural environment and human health and safety (such as exposure to radiation, toxic fumes, and fire).

Capital Improvement: This involves construction, rehabilitation, or renovation. This may include new construction, expansion, rehabilitation, or retrofit of buildings and facilities (e.g., hospitals, schools, clinics, centers, and libraries).

Pesticides: Any activity involving the procurement, transport, storage, use, or disposal of pesticides. Examples include land treatment for termite control during facility construction and use of a chemical product for rodent control during facility operation.

2.0 BASELINE ENVIRONMENTAL INFORMATION

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

Projects under ASHA may take place in any USAID Mission or country covered by a USAID Regional Mission. It is anticipated that ASHA projects will be carried out in varying urban and rural ecosystems and in areas that are beset by poverty and/or are recovering from damage and destruction caused by military operations and insurgency activities. Because the specific characteristics and locations of these projects are unknown and expected to vary significantly, it is not possible to analyze the baseline environmental conditions for all locations affected.

Using guidance provided in this ASHA Global IEE, all ASHA IPs will be required to develop project site-specific IEEs (Supplemental IEEs) and/or EMMPs that addresses necessary mitigations to address the negative determinations and CRM risks identified in Table I (p.2) for the types of activities identified on p.7.

2.2 APPLICABLE AND APPROPRIATE PARTNER COUNTRY AND OTHER INTERNATIONAL STANDARDS (E.G., WHO), ENVIRONMENTAL AND SOCIAL LAWS, POLICIES, AND REGULATIONS, AND INSTITUTIONAL STANDARDS (E.G., ISO, SCHOOL/HOSPITAL CERTIFICATIONS)

Implementation of award projects must, in all cases, adhere to applicable partner country environmental laws and best practices. For projects requiring supplemental IEEs,⁶ the implementing partner (IP) must include descriptions of all relevant environmental policies and procedures. IPs may source partner-country environmental policy and regulatory framework information from past IEEs that are publicly available at the USAID Environmental Compliance Database: <https://ecd.usaid.gov/>. However, the IP must ensure they capture any additional relevant policies/regulations, including any that have been enacted since the past IEEs were developed. They cannot assume that past IEEs would have all the most current and applicable information.

It is quite common for many of the ASHA grant holding institutions to already in possession or to be actively seeking various international sustainability certifications. If applicable, IPs may provide information on any institutional standards and certifications the institution as a whole holds or is working towards. This can include Institutional Organization for Standardization (ISO) certifications, or green building certifications, including Leadership in Energy and Environmental Design (LEED), Building Research Establishment Environmental Assessment Method (BREEAM) and Green Star, or other standards specific to educational and healthcare institutions.

2.2.1 APPLICABLE AND APPROPRIATE USG AND INTERNATIONAL STANDARDS AVAILABLE FOR CONSULTATION

To develop project-specific analyses, ASHA IPs are expected to first draw from existing USAID or other country-level environmental analyses, including [118/119 Biodiversity and Tropical Forestry Assessments](#), the [International Union for Conservation of Nature](#), the [UN Environment Knowledge Repository](#), and the [International Association for Impact Assessment](#). The USAID Mission Environmental Officer (MEO) may also be consulted to provide additional resources or assistance.

ASHA IPs are also expected to refer to the following resources when developing analyses that evaluate climate risk considerations: The [USAID ClimateLinks website](#) provides country- and region-specific

⁶ Supplemental IEEs can also be called Awardee IEEs

profiles on climate vulnerability, risk and/or adaptation. The USAID Mission Climate Integration Lead (CIL) may also be consulted to provide additional resources.

3.0 ANALYSIS OF POTENTIAL ENVIRONMENTAL RISK

3.1 COMMODITY PROCUREMENT

Without proper management, commodity procurement poses potential risks to human health and/or the environment, particularly in relation to the resulting generation and disposal of wastes. This ASHA Global IEE identifies three main categories of wastes resulting from commodity procurement, each with an associated risk:

- General wastes (X). General waste is similar to most domestic waste and includes plastic and paper packaging. Most healthcare wastes fit into this category, which does not require special handling.
- Medical wastes (M). Medical waste refers to hazardous wastes that are infectious, chemical, or radioactive wastes generated by healthcare activities and spans a broad range of materials including diagnostic samples, blood, used sharps (needles, scalpels, etc.), pathological or anatomical wastes, chemicals, pharmaceuticals, and radioactive materials.⁷
- Other hazardous wastes (H). Other hazardous waste is waste that is not classified as medical waste but that requires special handling and disposal, generally due to the presence of heavy metals or other toxic materials. Examples of hazardous commodities include batteries, fluorescent light bulbs, and computer monitors.

In order to screen for these risks, the commodities are classified as “H” for Hazardous, “M” for Biomedical, and “X” for neither hazardous nor biomedical.

TABLE 2. CLASSIFICATION OF WASTE STREAMS FROM EXAMPLE COMMODITIES

General (X)	Medical waste (M)	Other hazardous waste (H)
Furniture (chairs, tables, desks)	Incubator	Generator
Journals and magazines	Surgical Instrument set	Desktop computer/Laptop
Office Supplies	Defibrillator	E-book reader device/Tablets
Books	Endoscope	Solar panels, batteries, inverter
OR table	Electrosurgical unit	Chemistry Laboratory Kit
Office shelves	CT Scanner	TV and computer monitors
Data storage	Ventilator	Microscope

3.1.1. ENVIRONMENTAL IMPACTS

The environmental impacts associated with the procurement, transport, use, storage, and disposal of materials, resources, or equipment containing hazardous materials or generating hazardous wastes include 1) contamination of water, air, and soil, 2) increase in disease transmission, and/or 3) exposure of workers or local population to harmful, toxic, and carcinogenic materials and wastes.

⁷ WHO, 2015 http://www.who.int/topics/medical_waste/en

Waste management is a major issue for many of the urban and peri-urban educational center activities, meetings, conferences, and trainings funded by ASHA. Many of these centers have sub-standard solid waste management systems, which can contribute to the adverse impacts described above and adversely impact both public health and economic development.

- **General waste management**

General waste is comparable to domestic waste and is usually called “non-hazardous” waste. It comes mostly from office, kitchen and housekeeping activities and may also include packaging waste and waste generated during maintenance of commodities and infrastructure. It does not require special handling.

- **Contamination and disease transmission from medical waste**

Some commodities likely to be procured by ASHA-funded projects, such as ventilators, surgical equipment, and endoscopy probes, have the potential to generate medical waste during use, such as sharps, pathological waste, radioactive or cytotoxic waste. Other commodities may require the use of hazardous chemicals during their operation and maintenance, such as halogenated solvents and formaldehyde used in diagnostic and laboratory work or to clean/disinfect certain equipment. Improper handling and disposal of these waste streams may adversely affect both human health and the environment. Poor management of healthcare wastes often occurs in small-scale facilities in developing countries where ASHA supports projects and where it is common practice to dispose of healthcare wastes along with other solid wastes or to bury the medical wastes without treatment. Disease transmission can occur due to inadequate treatment and disposal of medical waste and impact patients, healthcare workers and staff, visitors, waste handlers, and the general public.

Inadequate disposal of chemical and pharmaceutical waste carries many risks. Unwanted pharmaceuticals and chemicals are often dumped into septic tanks or latrines. Disposal in unlined landfills or pits could create a hazardous leachate that may contaminate ground and surface water, affecting human and environmental health.

Inadequate incineration of medical wastes has many potential risks. USAID recognizes and supports the sound use of medical waste incinerators; however, it is important to emphasize that medical waste management requires strong technical oversight to ensure safe and effective treatment. Large volumes of medical wastes are very difficult to properly treat via incineration even with robust levels of staff training and funding and access to routine maintenance. These resources are often lacking in many situations in which ASHA operates, which often face challenges due to overwhelming demand for disposal due to urban or densely populated settings and a lack of maintenance for aging infrastructure. Improper incineration of hospital waste is associated with a variety of environmental and public health threats. It is linked to the release of heavy metals, acid gases, and particulates into the air and, ultimately, into bodies of water. If the ash is not disposed of properly then it, too, poses a threat to air quality and water supply.

- **Contamination from other hazardous waste (e.g., electronic waste (e-waste), heavy metals)**

Some commodities likely to be procured under ASHA-funded projects have the potential to generate other hazardous waste, including heavy metals. Examples include:

- Electronic equipment, such as computers, whose components (e.g., monitors, printed circuit boards) contain lead and mercury
- Energy-saving lighting (e.g., mercury in fluorescent light bulbs; lead, arsenic, nickel and other potentially dangerous and carcinogenic substances in LED light bulbs)⁸
- Non-digital X-ray and other radiography equipment require the use of X-ray films, which contain heavy metals such as silver thiosulfate

These heavy metals can cause significant environmental and health impacts if improperly disposed of, ranging from damage to the nervous system and kidneys, to water and land contamination from inadequately disposing of such equipment. Adverse impacts may affect workers exposed to heavy metals during handling and disposal of these commodities, requiring adequate mitigation measures.

These wastes require segregation before treatment and use of treatment techniques appropriate for each of the different waste streams. It has previously been observed in ASHA programs that anaerobic digestion has been used as alternatives for hazardous waste treatment. And while such innovative measures are commendable, proper measures must be taken to ensure that these treatment techniques are effective and efficient for the specific waste streams they intend to address. Anaerobic digestion (while highly effective for disposal of certain types of waste and an innovative technology that generates biogas) can be disrupted by adding various chemical waste streams to the mix, resulting in incomplete waste treatment, damage to the biodigester, and release of toxic effluents. Therefore, adequate segregation of waste streams and appropriate selection of treatment technique is necessary for effective management and disposal of hazardous waste streams.

3.1.2. CLIMATE RISKS

Current and future climate conditions can affect the ability to procure, deliver, use, maintain and store commodities procured under these awards.

The nature and degree of climate risk for a given commodity depends on the characteristics of the commodity (e.g., usable life span, required storage conditions, intended purpose/use), and, perhaps most importantly, the geography and location(s) where the commodity will be delivered and used. One hospital site may face a much greater risk of flash flooding, high winds, and/or storm surge linked to rising sea levels than a second site due to their respective locations and elevations within a country. It is critical to understand the climate conditions (both historical and future projections, to the degree possible) for relevant locations in the life-span of a commodity.

Example climate conditions which might affect commodities:

- High temperatures and/or humidity could affect the integrity or longevity of the commodity (e.g., temperature/moisture sensitive lab or medical equipment and pharmaceuticals) and the structure in which it is stored and used.

⁸ Scientific American, 2012 <http://www.scientificamerican.com/article/led-lightbulb-concerns/>.

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

3.2 CAPITAL IMPROVEMENT

3.2.1. ENVIRONMENTAL IMPACTS

Construction, rehabilitation, and renovation activities have the potential to cause direct and indirect adverse environmental impacts.

Direct impacts may include habitat loss when land is converted for use as a project site or the introduction of an invasive species when replanting vegetation around construction sites. Indirect impacts may include induced changes in the environment, population, and/or use of land and environmental resources arising from an influx of construction workers, the development of worker camps, and increased camp staff interactions with surrounding resources and populations (e.g., habitat loss or changes to habitat due to noise and/or light pollution, deforestation for campfires, traffic congestion, spread of disease including Sexually Transmitted Infections, and increase in sexual assaults).

Examples of potential impacts associated with construction or renovation are provided below; however, the below examples are not exhaustive. Environmental impacts associated with capital improvements are often temporary and end when the construction activity is complete; however, some impacts may occur or continue after construction.

- **Air pollution**
Earthwork activities that disturb soil and generate dust create ambient air pollution. Vehicles disturbing and transporting soil, products, materials, and fuels in and out of construction areas generate dust and emit toxic gases, such as SO_x, NO_x, CO, CO₂, and C_xH_y. Air pollution includes the generation of dust, acidic gases and carbon monoxide as detailed below:
- **Dust**
Dust is a group of inorganic and organic small-sized substances existing in suspended form, settlement form, or vapor gas, smoke, and foggy form in the air. Dust is mainly larger than 5 micrometers. When people breathe dusty air, the dust is trapped in the bronchus by vibrissae. Smaller particles may enter the alveolus, which can cause lung fibrosis, coughing, chest soreness, and/or infection.
- **Acidic gases**
Acidic gasses like Sulfur Oxides and Nitrogen Oxides combine with oxygen in the air, and then with moisture in the air to form acidic steam that can irritate mucous membranes. A high concentration of acidic gases in the air can damage tree leaves after a couple hours of exposure.

- **Carbon monoxide**
Carbon monoxide is a poisonous gas that produces toxic carboxyhemoglobin when it comes in contact with hemoglobin, which decreases the transference of oxygen in blood in human tissue.
- **Aerosols and Refrigerants**
Capital improvements and commodities may require the use of refrigerants or aerosols that could impact ozone layer. They could also increase the overall risk of fire, radiation or chemical emissions from the facility.
- **Noise pollution**
Noise pollution can affect worker health and may lead to reduction of work capacity. Contact with loud noises causes the body to become tired and produces headaches, dizziness, and more frequent labor accidents. Contact with noise for long periods of time can easily cause occupational deafness. Noise pollution can impact nearby communities by altering social routines and negatively impacting social services (e.g., disrupt classroom activities, disturb patients in hospital).
- **Soil erosion and sedimentation of surface waters**
Removal of natural land cover, excavation or extraction of construction materials or resources for facility operation (e.g., sourcing of wood resources from a degraded forest to heating), and other related activities can result in soil erosion. Soil erosion increases flood potential and can lead to sedimentation in receiving waters. Sedimentation may reduce the capacity of ponds and reservoirs, further increasing flood potential, or it may substantially alter aquatic ecosystems by changing streambed, lakebed, and estuary conditions.
- **Surface and groundwater contamination**
Toxic materials are often used in construction or building maintenance. Examples include solvents, paints, vehicle maintenance fluids (oil, coolant), and diesel fuel. If these are inappropriately used, stored, or disposed of, they may contaminate ground or surface water supplies. This may harm the health of the local community, as well as the populations living down gradient and downstream. Aquatic and terrestrial ecosystems may also be damaged. (See description of impacts from wastewater and sanitation facilities in next section).
- **Small-scale wastewater and sanitation systems**
Potential adverse impacts from improperly implemented wastewater and sanitation activities include: 1) increased human health risks from contamination of surface water, groundwater, soil, and food by excreta, chemicals, and pathogens (e.g., cholera, arsenic poisoning); 2) increased incidence of vector-borne diseases (e.g., malaria); and 3) ecological harm from degradation of stream, lake, estuarine, and marine water quality and degradation of land habitats. Moreover, foul odors from wastewater degrade the overall aesthetic environment and can potentially degrade groundwater via with the aforementioned discharge components.

These risks are often increased when the wastewater originates from a hospital, as it often contains high concentrations of organic and inorganic chemicals, detergents, and pathogenic bacteria from examination and treatment rooms, laboratories and test labs, and restrooms and washing rooms for patients and staff, among other sources.
- **Potable water quantity and quality assurance**
Insufficient potable water quantity may lead to the consumption of water with poor quality, leading to the spread of waterborne diseases such as diarrheal diseases, typhoid fever, cholera, dysentery, salmonellosis and botulism. It is therefore important to evaluate water needs and

water availability, with special consideration for the expansion in planned activities (e.g., the influx of more students or patients as a result of new construction) as well as climate projections and extreme weather events that may add stress to existing water sources.

The USAID Africa (AFR) Bureau has recently released guidance and a template for developing a Water Quality Assurance Plan ([WQAP](#), also see [Annex F](#)). USAID emphasizes analysis of the following eight parameters, at a minimum, given their potential for significant health impacts: arsenic, fecal coliforms, fluoride, nitrate, electro-conductivity, total dissolved solids (TDS), pH and turbidity.⁹ The consumption of arsenic at high concentrations can lead to death, while long-term exposure at lower concentrations through drinking water sources can lead to a severe chronic illness called arsenicosis. Fecal coliform, especially *Escherichia coli* (*E. coli*), is the most common waterborne pathogen linked to diarrheal diseases. According to the World Health Organization, diarrheal diseases cause 1.5 million deaths annually, and approximately, 58% of these deaths are attributable to unsafe water supply, sanitation facilities, and hygiene practices.

The following table, extracted from the [USAID AFR Bureau WQAP template](#) (p. 10-11) outlines USEPA and WHO limits for these eight minimum parameters. The implementing partner will be required to also add host country regulations limits and frequencies for these parameters. Where there are discrepancies between the three guidance limits, the most stringent limit must be respected.

Parameter	USEPA Guidance		WHO Guidance	
	Limit	Frequency	Parameter	Frequency
Arsenic	0.01 mg/l	quarterly	0.01 mg/l	Not Stated
Fecal Coliform	00/100 ml	quarterly	00/100 ml	Not Stated
Fluoride	4.0 mg/l	Not Stated	1.5 mg/l	Not Stated
Nitrate	10 mg/l	Not stated	50 mg/l	Not Stated
Electrical Conductivity (EC)	1600 µS/cm	Not Stated	Not Stated	Not Stated
Total Dissolvable Solids (TDS)	500 mg/l	Not Stated	1000 mg/l	Not Stated
pH	6.5 - 8.5 S.U.	Not Stated	Not Stated	Not Stated
Turbidity	5 NTU	Not Stated	Not Stated	Not Stated

⁹ Analysis of these parameters — at minimum — is required by USAID AFR Bureau's recently released template and guidance for developing a Water Quality Assurance Plan ([WQAP](#)).

- **Solid waste management**

The typical solid waste stream for capital improvement projects will contain construction and demolition debris, general operational wastes (organics and recyclables), as well as special wastes (household hazardous, healthcare, and industrial waste). Most adverse environmental impacts from solid waste management are rooted in inadequate or incomplete collection and recovery of recyclable or reusable wastes and improper disposal of hazardous wastes due to inappropriate siting, design, and management of dumps and landfills. The renovation of old buildings may also generate asbestos waste, polychlorinated biphenyls (PCBs) waste (found in caulk, transformers, fluorescent light ballasts, etc.), heavy metal waste (often found in lighting systems and flooring), and lead-contaminated dust. Improper solid waste management activities can lead to the following:

- **Increased disease contraction and transmission.** Rotting organic materials pose great public health risks, such as breeding grounds for disease vectors. Human and/or animal excreta or healthcare wastes in the waste stream pose increased risk of disease transmission. Waste handlers and waste pickers are especially vulnerable to these risks and may also become vectors by contracting and transmitting diseases. (See the discussion on healthcare wastes below). Asbestos or lead containing materials also have the potential to pose serious health risks. Asbestos is a known contributor to lung cancer and respiratory problems, such as mesothelioma and asbestosis.
- **Contaminated ground and surface water.** Solid waste streams can bleed toxic materials and pathogenic organisms into the leachate of dumps and landfills (leachate is the liquid discharge of dumps and landfills; it is composed of rotted organic waste, liquid wastes, infiltrated rainwater, and extracts of soluble material). If the landfill is unlined, this runoff can contaminate ground or surface water, depending on the drainage system and the composition of the underlying soils. Many toxic materials, once placed in the general solid waste stream, can be treated or removed only with expensive advanced technologies. These are generally not feasible in countries where ASHA implementing partners work.
- **Increased greenhouse gas emissions and other air pollutants.** When organic wastes are disposed of in deep dumps or landfills, they undergo anaerobic degradation and become significant sources of methane, a gas with 21-25 times the effect that carbon dioxide has in trapping heat in the atmosphere. Garbage is often burned in residential areas and in landfills to reduce volume and uncover metals. Burning creates thick smoke that contains carbon monoxide, soot, and nitrogen oxide, all of which are hazardous to human health and degrades urban air quality. Combustion of polyvinyl chlorides (PVCs) generates highly carcinogenic dioxins.
- **Damaged ecosystems.** When solid waste is dumped into rivers or streams it can alter aquatic habitats and harm native plants and animals. The high nutrient content in organic wastes can deplete dissolved oxygen in water bodies, denying oxygen to fish and other aquatic life forms. Solids can cause sedimentation and change stream flow and bottom habitat. Dumps or landfills sited in sensitive ecosystems may destroy or significantly damage these valuable natural resources and the services they provide.

- **Injury to people and property.** In locations where shanty towns or slums exist near open dumps or near badly designed or operated landfills, landslides or fires can destroy homes and injure or kill residents. The accumulation of waste along streets may present physical hazards, clog drains, and cause localized flooding.
- **Discouraged tourism and other business.** The unpleasant odor and unattractive appearance of piles of uncollected solid waste along streets and in fields, forests, and other natural areas can discourage tourism and the establishment and/or maintenance of businesses.
- **Construction Material Sourcing**
Implementing partners should pay close attention to the sourcing of materials used in construction and renovation activities. For example, borrow pits may be located in stream or river beds or endanger other infrastructure; timber may be sourced illegally or treated with toxic chemicals offsite; materials used could contain lead or asbestos; arsenic and/or lead could be encountered during renovation, endangering the health of facility users and construction workers.
- **Construction Health and Safety**
Implementing partners should ensure that construction firms are adhering to strict standards of construction safety for workers and people nearby. For example, the need to restrict access to or fence off certain dangerous areas, and for clear signage set up to warn people of hazards. Worker must also wear adequate Personal Protection Equipment (helmets, dust masks, gloves, etc.). Environmental noise should be managed and kept to a minimum and at reasonable hours. Transport of materials on/off site should be carefully managed to avoid endangering people nearby. Runoff should be contained. Alternate pedestrian walkways should be installed. Paint and other materials with toxic fumes should be handled with appropriate ventilation and safety.

3.2.2. CLIMATE RISK CONSIDERATIONS

Construction activities and the longevity of the finished products may experience significant impacts due to climate stressors. Heat waves, wildfires, dust storms, and other climate-related impacts may affect construction timelines and workers. Changes in the frequency or severity of extreme rainfall events and flooding, as well as increasing maximum temperatures can affect the longevity/usable life of structures and facilities.

There is an additional layer of consideration with respect to climate risks for construction siting decisions. Changing climate conditions and resulting sea level rise can significantly affect the suitability of certain potential sites for new construction and rehabilitation of existing buildings. For example, some geographic locations may face a much greater risk of impacts from storm surges and flooding, as well as associated landslides and erosion.¹⁰

¹⁰ For further details on considering climate risks for small-scale construction, see the [USAID Climate Risk Screening and Management Tool: Annex on Infrastructure, Construction, and Energy](#) as well as the USAID technical report on [Addressing Climate Change Impacts on Infrastructure](#).

3.3 PESTICIDES

3.3.1. ENVIRONMENTAL IMPACTS

Pesticides are any substance or mixture of substances that prevent, destroy, repel or mitigate any pest. They can also be used as a plant regulator, defoliant or desiccant, or nitrogen stabilizer. As such pesticides include fungicides, herbicides and other substances used to control any pest or weed.

Many ASHA projects treat soil and timber with pesticides to control pests such as termites, wood borers, rodents and fungi. Pesticides have significant adverse impacts that users and the general population are often unaware of when handling them.

Sometimes, toxic chemicals such as creosote and chromated copper arsenate (CCA) are used to treat wood. However, creosote is a known carcinogen, and as such has been rejected from use by USAID-financed activities. Likewise, the use of CCA for indoor residential use was discontinued by the EPA in 2004 by manufacturers and contact with CCA-treated wood may overtime lead to a risk of exposure to arsenic content. The [USAID Global Construction PERSUAP](#)¹¹ (or Global Construction PERSUAP) provides more guidance on recommended pesticide active ingredients rejected substances for termite and rodent control ASHA construction-related activities.

Most pesticides impact not only their target species, but also non-intended species, air, water, bottom sediments, and the food humans consume. Pesticides can contaminate land and water when used or discarded improperly. Humans and other animals who ingest, inhale, or come in dermal contact with pesticides may suffer side-effects ranging from mild skin irritation to birth defects, tumors, genetic changes, blood and nerve disorders, endocrine disruption, and even coma or death.

Inappropriate use of pesticides can also increase pest resistance and kill the natural enemies of pests, which is counterproductive to the pesticides' original purpose. Some pesticides contribute to climate change and the depletion of the ozone layer.

3.3.2. CLIMATE RISK CONSIDERATIONS

Climate change may affect pest behavior and distribution, intensity of pest infestations and may decrease the effectiveness of pesticides. For example, termites prefer habitats that are well drained and are not too dry or too wet. Changing rainfall and temperature patterns due to climate change could impact geographic range and size of colonies, therefore influencing the distribution and concentration of termiticide use.¹² Termite damage has been observed to be of greater intensity during periods of drought or excessive rainfall in contrast to periods of regular precipitation.¹³ Thus, if climate change results in extremes such as drought and heavy rainfall, damage from termites may increase.

While global average temperatures are expected to continue to rise, rainfall patterns are expected to change differently depending on geography. For example, climate projections may include increasing temperatures, an increase in extreme weather with intense precipitation and resultant flooding, and longer dry periods (among other potential climate stressors).

Although there is uncertainty regarding the degree to which such changes will occur and what their magnitude and severity may ultimately be, climate change could lead to increased surface runoff,

¹¹ USAID Global Construction PERSUAP (2019): https://ecd.usaid.gov/document.php?doc_id=51716

¹² Carnegie Science, 2010 <https://carnegiescience.edu/news/termites-foretell-climate-change-africa%E2%80%99s-savannas>

¹³ Ahmed, B.M., P.O.Y. Nkunya, G.W. Sileshi, J.R.J. French, P. Nyeko and S. Jain. 2011. Potential Impact of Climate Change on Termite Distribution in Africa. British Journal of Environment and Climate Change, 1(4): pp. 172-189. Available at: http://www.journalrepository.org/media/journals/BJECC_10/2011/Sep/1317149951-Ahmedetal_2011BJECC561.pdf

increased soil percolation/infiltration and an increased threat from termites. Considering future climate scenarios is relevant for determining when and where to use termiticide.

While evidence is largely lacking about how climate change will impact distribution of rodents, there is concern that increases in temperatures and rainfall will impact rodent distribution and the potential exposure of populations to zoonotic diseases. Studies suggest that some climate change scenarios could lead to an increase in rodent populations in temperate regions, potentially increasing the risk of disease transmission, particularly in urban areas.¹⁴

Climate change may impact the spread of pesticides through air, land, and water. For example, more frequent and intense storms could lead to flushing of pesticides into surface and ground water resources.

¹⁴ European Centre for Disease Prevention and Control, 2019 <https://ecdc.europa.eu/en/climate-change/climate-change-europe/rodent-borne-diseases>.

4.0 ENVIRONMENTAL DETERMINATIONS AND CLIMATE RISK RATINGS

USAID's environmental impact assessment (EIA) process evaluates the reasonably foreseeable direct, indirect, and cumulative adverse impacts of a proposed project and its activities on the environment and of the environment on the project. This analysis results in environmental threshold determinations that document the Agency's decision as to whether an action will have a significant adverse impact on the environment and what, if any, additional environmental analyses and mitigation and monitoring measures are required. Environmental threshold determinations are documented in this ASHA Global IEE and, for some intervention types, will be refined by supplemental project-specific IEEs or EAs.

This EIA process occurs in parallel to the process of screening for and addressing climate risks. Effectively limiting risks posed by climate change requires understanding and mitigating environmental impacts. Landscapes that have become increasingly degraded due to years of poor land management are likely to have exacerbated climate risks, for instance. While USAID and IPs cannot control climate variability, it is possible and a priority to help communities better manage their land, air, and water in order to reduce risk. USAID requires application of the climate risk management (CRM) process to assess, plan for, and document the risks affecting each activity and to limit those risks and identify opportunities for improved development outcomes. ADS Mandatory Reference 201mal¹⁵ describes the CRM process and requirements, including rating activities as Low, Moderate, or High Climate Risk.

4.1 RECOMMENDED ENVIRONMENTAL THRESHOLD DETERMINATIONS

This section describes the environmental threshold determinations and identifies the recommended threshold determinations for ASHA activities based on the anticipated likelihood and severity of environmental impacts.

4.1.1. CATEGORICAL EXCLUSION

A Categorical Exclusion, pursuant to 22 CFR 216.2(c)(2), is recommended for activities that will not have an effect on the environment and belong to a class of actions set forth in 22 CFR 216.2(c)(2). A Categorical Exclusion is recommended for the following ASHA activities:

- education, training, and technical assistance training programs, with the exception of those that include activities directly affecting the environment, such as the use of pesticides or biomedical equipment.
- procurement of commodities, materials, resources, and/or equipment that do not contain hazardous materials or generate medical or other hazardous waste.

4.1.2. NEGATIVE DETERMINATION

A Negative Determination pursuant to 22 CFR 216.3(a)(2)(iii), is recommended for activities that will not have a significant adverse effect on the environment. A Negative Determination with Conditions is recommended for activities that will not have a significant adverse effect on the environment if enumerated mitigation and monitoring requirements (conditions) are implemented and effective. A Negative Determination with Conditions is recommended for the following ASHA activities:

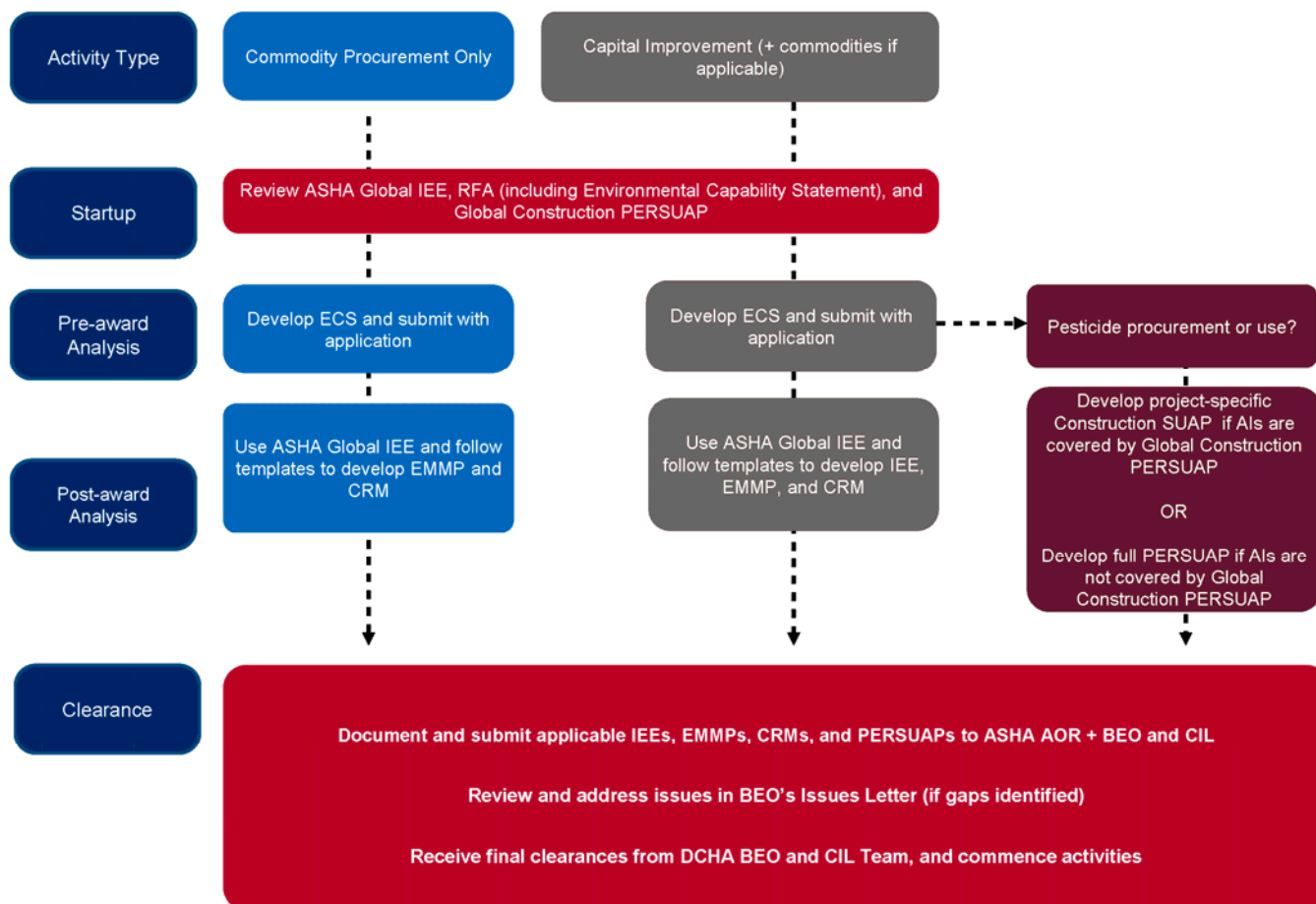
- procurement of commodities that contain hazardous materials or generate medical or other hazardous waste, including biomedical and analytical equipment and related supplies.
- small-scale construction and renovation of facilities, including schools, universities, and hospitals.

¹⁵ USAID ADS 201mal: https://www.usaid.gov/sites/default/files/documents/1868/201mal_042817.pdf

- procurement, use, transport, storage, or disposal of pesticides. This includes the use of a termite control during facility construction or rodent control during facility operation. [Note: 22 CFR 216.3(b) discusses pesticide procedures.]

4.1.3. PRE-AWARD AND POST-AWARD EIA PROCESS

This ASHA Global IEE serves as a pre-award decisional document (see Figure 1) as does the Environmental Capability Statement (ECS) developed by IPs and submitted along with their applications. Post-award, all ASHA IPs will develop project-specific Environmental Mitigation and Monitoring Plans (EMMP)s and Climate Risk Management (CRM) screening and conduct annual reporting through the Environmental Mitigation and Monitoring reports (EMMRs) as part of the ASHA Quarterly Progress Report (QPR) process (see Figure 2). Also, ASHA IPs whose activities fall within specific intervention categories, will develop supplemental, project-specific IEEs and/or Environmental Assessments (EAs - for high risk activities like those in a protected area or new undeveloped land). These project-specific documents will analyze the project-specific environmental baselines and potential environmental impacts, and specify measures required to mitigate and monitor potential impacts. The documents will also set forth implementation features of budgeting, monitoring, and reporting. IPs will be responsible for submitting these compliance documents to the AOR. The AOR will be responsible for clearing on and subsequently sharing these documents with the respective Mission Environmental Officer (MEO) at post and/or Regional Environmental Advisor (REA) for clearance. The AOR must also share this document with the ASHA Engineer to ensure mitigations are incorporated into any construction plans by the A&E firm who will bear full responsibility for ensuring construction contractor implements these plans. The implementing partner will provide evidence that final O&M plans for facilities and equipment include mitigations with the submission of final report.



Active Ingredient (AI) – Agreement Officer Representative (AOR) – Bureau Environmental Officer (BEO) – Climate Integration Lead (CIL) – Climate Risk Management (CRM) – Institutional Arrangement Plan (IAP) – Initial Environmental Examination (IEE) – Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP) – Request for Applications (RFA)

Figure I. ASHA EIA Process

4.2 RECOMMENDED CLIMATE RISK RATINGS

This section describes the climate risk ratings and identifies the recommended rating for ASHA activities based on the anticipated likelihood and severity of climate risks on an activity's implementation and outcomes. Implementing partners are responsible for ensuring all sub-awards and sub-contracts contain language addressing climate risk considerations identified in the Climate Risk Management (CRM), IEE and EMMP.

4.2.1 HIGH CLIMATE RISK

A High Climate Risk rating, per 201mal (Sec 3) indicates it is likely that those activities will be materially impacted by climate risks (high probability, high impact). A High Climate Risk rating is recommended for the following ASHA activities:

- all construction and rehabilitation of facilities, including small- and large-scale activities.

- commodities stored in a facility exposed to high flood risks or other climate-related risks

Some examples of climate impacts that have been observed for ASHA awards are provided below:

- **Flooding:**
 - Any ASHA investment (i.e., construction or rehabilitation, and placement of high value commodities) placed at sea-level or below sea-level.
 - Any new construction or material changes to overall impermeable surface and/or drainage/surface gutter systems.
 - Any construction/rehabilitation or commodities placed in areas expected to be impacted by rising sea levels; expected to be impacted by major meteorological events, and/or adjacent to large bodies of water and/or stream beds (wet/dry).
- **Landslides:** Any construction/remodeling of facilities located on areas prone to landslides caused by heavy rains, especially rain following periods of drought.
- **Drought:**
 - Any construction/remodeling of facilities that would result in overall demand for water/sanitation services. This includes the installation of wells/ boreholes, especially in drought prone areas or areas where groundwater table could be affected.
 - Any construction/remodeling of facilities in areas that could be at an increased risk of drought and fire.
- **Changes in annual precipitation:** Small-scale hydropower facilities.

Once sufficient activity-specific information becomes available (e.g., geographic detail indicating climate conditions and projections), a complete CRM Screening (per Mandatory Reference 201mal) must be conducted, including documentation of risk management options.

4.2.2 MODERATE CLIMATE RISK RATING

A Moderate Climate Risk rating, per 201mal (Sec 3) indicates it is less likely that those activities will be materially impacted by climate risks (moderate probability, moderate impact). A Moderate Climate Risk rating is recommended for the following ASHA activities:

- procurement, use, transport, storage, or disposal of pesticides.
- commodity procurement activities, such as solar PV installations whose performance could be directly impacted by weather changes increasing overall cloudiness, vegetation cover and/or changes in ambient particulate matter.

4.2.2 LOW CLIMATE RISK RATING

A Low Climate Risk rating, per 201mal (Sec 3) indicates that such activities are not likely to be materially impacted by climate risks (low probability, low impact). A Low Climate Risk rating is recommended for the following ASHA activities:

- education, training, and technical assistance.

The IP must include a note indicating the Low Climate Risk rating for any pesticide or education, training, and technical assistance activities in the CRM screening that accompanies the supplemental IEE or EMMP. No other action or documentation is required, unless the IP or USAID determine that the pesticide activity should be rated as Moderate or High climate risk.

4.3 ASHA GLOBAL IEE ENVIRONMENTAL THRESHOLD DETERMINATIONS AND CLIMATE RISK RATINGS

TABLE 3. ENVIRONMENTAL DETERMINATIONS AND CLIMATE RISK RATINGS

Projects/Activities	Recommended Environmental Threshold Decision	Recommended Climate Risk Rating
Education, training, and technical assistance, not including activities affecting the environment.	Categorical Exclusion, pursuant to 22 CFR 216.2(c)(2)	Low, as in ADS 201, Sec 3
Procurement of commodities that <u>do not</u> contain hazardous materials.	Categorical Exclusion, pursuant to 22 CFR 216.2(c)(2)	Moderate, as in ADS 201mal, Section 4 ¹⁶
Procurement of commodities that contain hazardous materials or generate medical or other hazardous waste, including biomedical and analytical equipment and related supplies.	Negative Determination	Moderate, as in ADS 201mal, Section 4
Small-scale construction and rehabilitation of facilities.	Negative Determination	High, as in ADS 201, Sec 3
Procurement, use, transport, storage, or disposal of pesticides (requires PERSUAP).	Negative Determination	Moderate, as in ADS 201mal, Section 4

4.4 CLIMATE RISK MANAGEMENT SUMMARY NARRATIVE

This climate risk management screening is conducted at the global level for ASHA as part of the pre-award CRM process. The intention is to capture the climate risks that could affect activities anticipated under ASHA awards. Given that the specific geographies (e.g., country, region, and coastal proximity), climate conditions, adaptive capacity, and other key characteristics that can shape risk are not yet defined at this level of analysis, the screening focuses on risks that can be broadly applied for a specific type of activity. Post-award, the ASHA IP will complete full screening once activity and geography details are defined. CRM must be provided for all activities, regardless of activity type. A critical resource used in identifying and assessing the climate risks was [USAID's Climate Risk Screening and Management Tool for Strategy Design + Annexes](#).¹⁷

¹⁶ As mentioned in the USAID ADS 201mal, CRM is an iterative and adaptive process, where risks and risk ratings are reconsidered as new information on either programmatic approaches or expected climate impacts becomes available. Recommended "Moderate" risk ratings may therefore be modified to either High or Low depending on the project-specific context.

¹⁷ Available at <https://www.climatelinks.org/resources/climate-risk-screening-management-tool>.

TABLE 4. CLIMATE RISK MANAGEMENT SUMMARY TABLE

Defined or Anticipated Project Elements	Timeframe Usable duration of investment	Geography Geographic scope	Climate Risks List key risks related to the activity types	Risk Rating Low/ Mod/ High	How Risks are Addressed at Project Level	Further Analysis and Actions for Activity Design/ Implementation	Opportunities to Strengthen Climate Resilience
Capital Improvement	Not defined in ASHA Global IEE	Not defined in ASHA Global IEE	To be completed when projects/activities and geographies are defined	High	To be completed when projects/activities and geographies are defined		
Commodity Procurement (excluding pesticides)	Not defined in ASHA Global IEE	Not defined in ASHA Global IEE	To be completed when projects/activities and geographies are defined				
Procurement, use, transport, storage, or disposal of pesticides	Not defined in ASHA Global IEE	Not defined in ASHA Global IEE	Increased temperatures and changing rainfall patterns can affect the distribution and behavior of termites and rodents. Changing rainfall patterns and extreme weather events, particularly floods and storms, can increase the likelihood of pesticides affecting water supplies	Low	Not required for Low Climate Risks		

5.0 CONDITIONS AND MITIGATION MEASURES

The environmental determinations in this IEE are contingent upon full implementation of the following general implementation and monitoring requirements by the IP. USAID will ensure that applicable requirements are met during the USAID review process.

The conditions and mitigation measures presented in this section are minimum requirements based on available information. These measures will provide general direction to the implementing partner on how and when to develop project-specific environmental and climate risk compliance documents required for compliance. These required compliance documents include:

- **Environmental Capability Statement (ECS):** This 1-page document completed during the pre-award stage describing how applicants plan to address environmental and climate risk concerns from project design throughout the life of project.
- **Environmental Mitigation and Monitoring Plan (EMMP):** This is a two-part plan which outlines how the implementing partner plans to mitigate the negative environmental and climate impacts associated with its planned activities, and sets out indicators, responsible parties and timing for monitoring the implementation and effectiveness of these mitigation measures. The EMMP should include site specific considerations that need to be mitigated to address climate and environmental risks, as well as risks to human health and safety. The EMMP should be preceded by site specific considerations that are not already in CRM. These might involve the need to address additional environmental issues due to the location of the facility that could impact health and safety. For example, certain medical equipment requires special vaults to contain radiation emissions, oxygen machines should not be located in areas with poor ventilation or where fire could affect safety, wells should not be located downstream from facilities that could cross contaminate, air quality may need to be regulated to ensure user safety, generators will not be located where toxic fumes could directly impact human health, etc.
- **Supplemental Initial Environmental Examination (IEE):** This project-specific analysis establishes mandatory environmental and climate risk-related conditions and mitigation actions that must be fulfilled during the activity implementation to protect the environment and human health.
- **Climate Risk Management (CRM) Screening:** This narrative and table enables the implementing partner to assess, address and adaptively manage the impacts of potential climate risks on each proposed activity.
- **Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP):** This two-part analysis is required for implementing partners who plan to use pesticides for pest management. This document comprises a 12-factor analysis of each active ingredient of pesticides proposed for pest control, as well as mandatory safer use conditions and integrated pest management measures to be implemented alongside pesticide use.

More details on these compliance documents will be provided in the conditions outlined below.

Given the global nature of this ASHA Global IEE, not all projects can be specified in detail sufficient for comprehensive impact analysis and establishment of mitigation and monitoring measures. At the project-level varying baseline environmental conditions will result in varying environmental impacts and require differing mitigation and monitoring measures. Therefore, the environmental mitigation and monitoring

tools found in this ASHA Global IEE are meant to serve as a starting point for analysis and mitigation and should not be used as the sole reference for the development of supplemental, project-specific documents. Those documents must describe the specific site context and activities that will be carried out under the ASHA award in sufficient detail to determine appropriate mitigation measures.

For projects requiring supplemental IEEs, EAs, and PERSUAP (e.g., projects with activities involving capital improvements or pesticides), those documents, once approved, will supersede the ASHA Global IEE sections on capital improvements and pesticides. As required by [ADS 204.3.4](#), the AOR will actively monitor and evaluate whether unforeseen environmental consequences arise during implementation of activities covered by this ASHA Global IEE, or a Supplemental IEE.¹⁸ If unforeseen consequences are identified, the AOR will modify or end activities as appropriate. During this process, the AOR will consult with ASHA IPs, Program Managers, MEOs (encouraged), and/or the [Bureau Environmental Officer](#) (BEO) and CIL.

5.1 PRE-AWARD

ALL AWARDS

- **Condition 1:** Adhere to ASHA Global IEE and Global Construction PERSUAP¹⁹ to develop proposal application

Applicants responding to the ASHA Request For Applications (ASHA RFA) should familiarize themselves with the findings, requirements, and processes included in this ASHA Global IEE, which establishes the ASHA environmental compliance process. It provides conditions for activity implementation, templates and references to inform partners' follow-up requirements, and information to begin developing subsequent environmental compliance document.

Applicants who may be involved in pesticide-related activities should also familiarize themselves with the Global PERSUAP for Termite and Rodent Control in Vertical-Build Construction (also known as the "Global Construction PERSUAP"), which specifies the active ingredients of pesticides that may or may not be used specifically for termite and rodent control as well as the safety, training, and monitoring measures that must be followed in ASHA projects when using termiticides, wood preservatives and rodenticides. The list of active ingredients for pesticides approved for use by the Global Construction PERSUAP can be found in the [Global Construction PERSUAP](#) and template for the project-specific Construction SUAP.

- **Condition 2:** Develop Environmental Capability Statement (ECS) as part of the project proposal application

Using the template for the Environmental Capability Statement ([Annex A](#)),²⁰ applicants should describe how they incorporate design principles that reduce environmental and climate-related concerns and impact liabilities. These principles must be incorporated at the initial project design stage and implemented throughout the life of project.

The ECS must: articulate the applicant's anticipated approach for fulfilling climate risk and environmental management requirements with regards to internal staffing, institutional arrangements, and project budget. Specifically, the ECS must articulate how the IP will be able to

¹⁸ The term "project-specific IEE" and "Supplemental IEE" will be used interchangeably in this document.

¹⁹ USAID Global Construction PERSUAP (2019): https://ecd.usaid.gov/document.php?doc_id=51716

²⁰ The ECS Template can also be found as Annex 3 of the ASHA RFA.

effectively respond to all climate risk and environmental management conditions established in the ASHA Global IEE and any required supplements throughout ASHA project implementation.

5.2 POST-AWARD

COMMODITY PROCUREMENT:

- **Condition 3:** Develop EMMP and CRM for Commodity Procurements awards.

IPs who will be procuring commodities must develop and submit an Environmental Mitigation and Monitoring Plan (EMMP) addressing the adequate management and disposal of these waste streams as well as overall operation and maintenance of commodities to be procured.

IPs will be required to use the Global EMMP template ([Annex C](#)) to develop a project-specific EMMP that addresses only project-specific impacts and mitigation measures. The Mitigation Plan, prepared by environmental specialists, documents environmental and pollution mitigation measures and climate risk management measures. The Monitoring Plan, prepared by a facilities manager, ensures that these mitigation measures have been adequately implemented and are effective to mitigate risks.

To adequately mitigate the environmental impacts and climate risks associated with commodity procurement activities, these project-specific EMMPs must include components such as adequate waste management for medical waste and other hazardous waste, as well as proper operation and maintenance measures. In addition, a project-specific Climate Risk Management (CRM) screening and narrative is also required. These requirements are detailed in the subsections below.

A - Mitigation measures for medical waste management:

As previously mentioned in Section 3.1., medical waste management includes a wide range of materials. These can be categorized in four main groups, mainly solid infectious waste, infectious sewage waste, blood and other infectious bodily fluids and sharps. The following table describes recommended disposal measures for these medical waste streams:

TABLE 5. RECOMMENDED DISPOSAL MEASURES FOR THESE MEDICAL WASTE STREAMS.

Type of medical waste	Recommended disposal measures
Solid infectious waste:	Incinerate, autoclave or bury these waste streams (more details provided below)
Infectious sewage waste (e.g., stools from patients with cholera or other forms of diarrhea)	Isolate patients if possible and capture stool/excreta in a bucket. Disinfect the excreta by adding disinfectant. In case of epidemic, disinfect all hospital sewage. Pour treated stools into a pit where they will be filtered by the soil but will not contaminate drinking water.
Blood and other infectious bodily fluids	Disinfect by adding disinfectant. Pour treated fluids into a pit where they will be filtered by the soil but will not contaminate drinking water.

Type of medical waste	Recommended disposal measures
Sharps	Separate from other waste. Immediately after use, put in a container that will keep liquids from leaking. Label/color code containers. Burn or encapsulate the sharps when containers reach three-fourths of their capacity. If container is to be reused, sterilize with bleach or other disinfectant.

Solid infectious waste can be disposed of either by incineration, autoclaving or burial, and each method has its own specific requirements as specified below:

- **Incineration:** If an incinerator is to be used by a facility, it should ideally be a double-chamber (i.e., pyrolytic) incinerator. When properly functioning, these significantly reduce the volume of waste, disinfect wastes very effectively, and release fewer toxic emissions, odors, and smoke than single-chamber and drum incinerators. USAID acknowledges that these incinerators are generally more costly than other incineration, burning, and burial options. However, USAID also acknowledges that extensively field-tested low-cost pyrolytic incinerators are now available, such as the De Montfort series.

It is also important to note that the incineration of toxin-emitting plastics, such as PVC, should be avoided in order to reduce the release of pollutants. This is of particular concern for countries that are signatories of the Stockholm Convention on Persistent Organic Pollutants.

The IP must ensure that staff, waste handlers and incinerator operators are adequately trained on best management practices and first aid response in case of accidents and provide waste handlers with adequate personal protection equipment to avoid their exposure to medical waste when handling them. A maintenance schedule should also be implemented, and a sufficient budget is required to properly use and maintain the incinerator.

- **Autoclave:** In general, an autoclave consists of a metal chamber enveloped in a steam jacket that is connected to a steam generator and an electric supply. Air must be removed from the chamber in order to ensure that the waste has adequate exposure to heat. Autoclaves must be monitored continuously for effectiveness, using indicator strips.

The advantages of using an autoclave are that they are simple and effective to use when operated correctly, they have demonstrated track records of high reliability, and the associated capital and operation costs are relatively low. The variability in models also allows for the selection of an appropriate autoclave for each facility's unique needs.

- **Burial:** This method may pose environmental and human health hazards if not done according to certain safeguards. Risks include injury to workers and the public from direct physical contact with waste items, leaching of infectious waste into surface streams or groundwater, or the burning of landfill waste leading to airborne smoke which may contain heavy metals and other chemical contaminants that over time may affect the health of site workers and the general public.

To mitigate these potential risks, the following basic principles should be respected:

- Access to the disposal site should be restricted to authorized personnel only.
- The burial site should be lined with a material of low permeability, such as clay, dung and river silt, if available, to prevent pollution of shallow groundwater and nearby wells.
- New water wells should not be dug near the disposal pit.
- Only infectious medical waste should be buried (if general hospital waste were also buried on the premises, available space would be quickly filled).
- Larger quantities (<1 kg) of chemical wastes should not be buried at one time; however, burying small quantities occasionally is less likely to create adverse pollution.
- The burial site should be managed as a landfill, with each layer of waste covered by a layer of soil to prevent odors and contact with the decomposing waste, and to deter rodents and insects

For further guidance on biomedical or healthcare waste management, refer to: WHO (2014). Safe Management of Wastes from Health-Care Activities, 2nd Edition/ edited by Y. Chartier et al., Geneva, World Health Organization - Chapter 8.11: Application of Treatment and Disposal Methods to Specific Waste Categories.²¹

B - Mitigation measures for the management of other Hazardous Waste:

- Implementing partners planning on procuring commodities that contain or may generate hazardous materials must ensure that **sound hazardous material minimization principles** and hazardous waste management considerations are addressed when acquiring equipment and/or procuring commodities.
- Adequate **waste management plans** must also be developed and implemented for all waste streams.
- Workers, students, and other individuals handling hazardous commodities and waste streams should be **adequately trained on best management practices** and **first aid response** in case of accidents and be given **adequate personal protection equipment** to avoid their exposure to such hazardous waste when handling them.
- Concerns and issues of hazardous materials management and hazardous waste disposal (e.g., both synthetic organic/ inorganic chemicals) must be evaluated with the **operation of biomedical analytical chemistry equipment** to include the generation of hazardous /toxic /radiological wastes (i.e., halogenated solvents, or wastes containing heavy metals - mercury, cadmium, etc.). Whenever feasible, **less hazardous options should be considered**, such as the use of Green Chemistry substances and products to replace more hazardous substances such as halogenated solvents in laboratory work.
- In the case of electronic equipment procurement, these waste management plans must include a recycling, donation and/or re-use of damaged equipment and/or donating obsolete equipment. Implementing partners are encouraged to contact local recycling companies and organizations specialized in e-waste and look into collaborating with or participating in existing government initiatives focused on **electronic waste management**.

²¹ WHO Blue Book (2014): http://apps.who.int/iris/bitstream/10665/85349/1/9789241548564_eng.pdf?ua=1

- As for heavy metals, implementing partners are encouraged to seek sound and locally appropriate means to deal with waste streams. For instance, the use of digital x-ray machines cancels the need for X-ray films and their hazardous components. And in the case of **CFL and LED light bulbs**, implementing partners should ensure the adequate handling of such waste in order to prevent exposure to the heavy metals they contain. The EPA has several resources on proper handling of broken CFL bulbs²² and best management practices²³ for mercury-containing light bulbs. Past ASHA programs have also adopted innovative measures for the safe treatment and disposal of mercury waste using sulfur-complex immobilization processes,²⁴ which can also be adopted on a smaller-scale by implementing partners in project activities.

C - Operation and maintenance of commodities

Another issue to consider in these project-specific EMMPs is the adequate maintenance and operation of these commodities, to ensure their sustainable use overtime, from procurement to appropriate final disposal when they have reached the end of their useful life. Adequate operation and maintenance plans should therefore also be in place for commodities requiring frequent upkeep, to promote the sustainability and efficient use of these investments in commodities. Final O&M plans should incorporate specific recommendations. Many schools and hospitals have specific committees that develop environmental health and safety plans as part of an accreditation process. The implementing partner is therefore required to indicate how specific mitigations to ensure ongoing environmental health and safety issues will be addressed and how follow up will be or is institutionalized at their facility.

D - Climate Risk Management

Upon receipt of the award, the IPs will also be required to develop a project-specific CRM screening and management plan for all activities. The purpose of the CRM is to identify and address climate risks and opportunities for all new USAID activities. The CRM will be submitted with the EMMP. Templates and guidance for developing the CRM table and summary narrative can be found in Annex [D](#).

There are many important resources that implementing partners can consult when developing the EMMP and CRM documents.

- IPs are advised to consult previous EMMPs and CRMs to research common environmental concerns and solutions among ASHA activities globally. IPs can utilize the [USAID Environmental Compliance Database](#) to search for USAID-approved EMMPs and CRMs.
- For technical guidance on environmentally sound design and management for USAID development activities, consult the [USAID Sector Environmental Guidelines](#).
- The [USAID website](#) contains detailed guidance and best-practice considerations for the development of the EMMP, including the [Environmental Mitigation and Monitoring Plan Factsheet](#).

²² EPA, 2015 <http://www2.epa.gov/cfl/cleaning-broken-cfl#important>

²³ EPA, 2014 <http://www3.epa.gov/epawaste/hazard/wastetypes/universal/lamps/faqs.htm#40>

²⁴ EPA, 1998 <http://www3.epa.gov/epawaste/hazard/tsd/ldr/mercury/imoblzn2.pdf>

- The [USAID Environmental Compliance Budgeting Toolkit](#) provides IPs with guidance on how to identify costs for environmental management tasks described in the EMMP and CRM.
- [Climatelinks](#) is a global knowledge portal for those working at the intersection of climate change and international development.

For meetings, conferences, and workshops classified as a Categorical Exclusion under 22 CFR 216.2(c)(2), it is expected that green procurement concepts be used to eliminate, reduce, or recycle waste as summarized in the Green Meeting ([Annex H](#)).

The following flowchart provides a summary of the pre- to post-award process for commodity procurement-only awards.

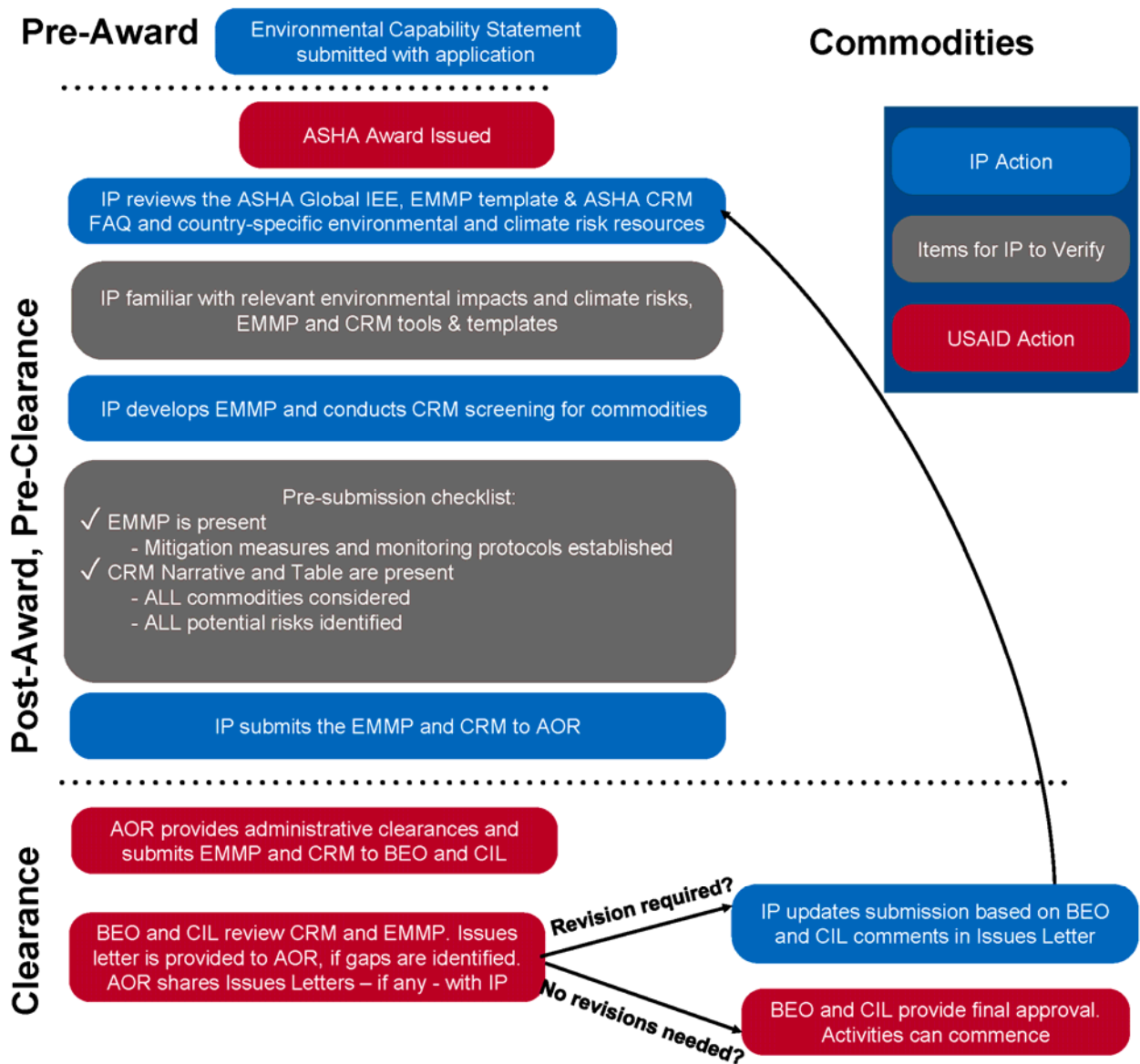


Figure 2: Commodity Procurement-only EIA Process

CAPITAL IMPROVEMENT:

- **Condition 4:** Develop an IEE, EMMP, and CRM for all Capital Improvement awards.

IPs will be required to develop a Supplemental IEE, EMMP, and CRM screening to provide environmental impact analysis and mitigation measures for all capital improvement interventions.

The IEE must 1) sufficiently describe the technical design of all interventions, 2) describe country environmental context and baseline, 3) identify all reasonably foreseeable environmental impacts

of interventions, and 4) recommend sound mitigation measures to prevent, reduce, or compensate for environmental impacts.

As an annex to all IEEs, ASHA applicants must complete an Environmental Mitigation and Monitoring Plan (EMMP) which serves as the implementation and monitoring plan for all required 22 CFR 216 compliance actions to be taken by a given activity. IPs will be required to use the Global EMMP template (see [Annex C](#)) to develop a project-specific EMMP that addresses only project-specific impacts and mitigation measures required by the IEE. The Mitigation Plan, prepared by environmental specialists, documents environmental and pollution mitigation measures and climate risk management measures during site selection, planning and design, construction, operation and maintenance. The Monitoring Plan, prepared by a facilities manager, verifies that steps to prevent impacts have been taken.

IPs will also develop a CRM screening for all activities. The purpose of the CRM screening is to identify and address climate risks and opportunities for all new USAID activities. The CRM must include a completed table along with a summary narrative (see Section 4.5). For all construction and renovation activities, the ASHA-Approved Architecture & Engineering (A&E) Services Provider responsible for engineering design must conduct the required CRM screening and approve the submitted CRM Summary Table and narrative. Templates and guidance for developing the CRM table and summary narrative can be found in [Annex D](#).

Submission of the Supplemental IEE, EMMP, and CRM screening for capital improvement:

- For commodity procurement activities within a capital improvement award, an EMMP and CRM screening covering only the commodity procurement activities can be submitted for approval by the BEO and CIL at any time, even before the A&E Services Provider has been cleared by ASHA. It is not necessary to submit a Supplemental IEE for only the commodity procurement activities. However, a Supplemental IEE must later on be provided (along with an [ASHA-Cleared A&E Services Provider certification](#) form) in order to move forward with capital improvement activities.
- For capital improvement-only awards, the CRM screening must be submitted along with the Supplemental IEE, the full EMMP and the [ASHA-Cleared A&E Services Provider certification](#) form, after ASHA approves the A&E Service Provider. The A&E Service Provider must complete and sign this certification form before the BEO and CIL can provide final approval.

There are many important resources that implementing partners can consult when developing these documents.

- For a general introduction on how to develop an IEE, consult the USAID [IEE Assistant](#).
- IPs are advised to consult previous EMMPs and CRMs to research common environmental concerns and solutions among ASHA activities globally. IPs can utilize the [USAID Environmental Compliance Database](#) to search for USAID-approved EMMPs and CRMs.
- For technical guidance on environmentally sound design and management for USAID development activities, consult the [USAID Sector Environmental Guidelines](#).
- The [USAID website](#) contains detailed guidance and best-practice considerations for the development of the EMMP, including the [Environmental Mitigation and Monitoring Plan Factsheet](#).

- The [USAID Environmental Compliance Budgeting Toolkit](#) provides IPs with guidance on how to identify costs for environmental management tasks described in the EMMP and CRM.
- [Climatelinks](#) is a global knowledge portal for those working at the intersection of climate change and international development.

The following flowchart provides a summary of the pre- to post-award process for capital improvement awards.

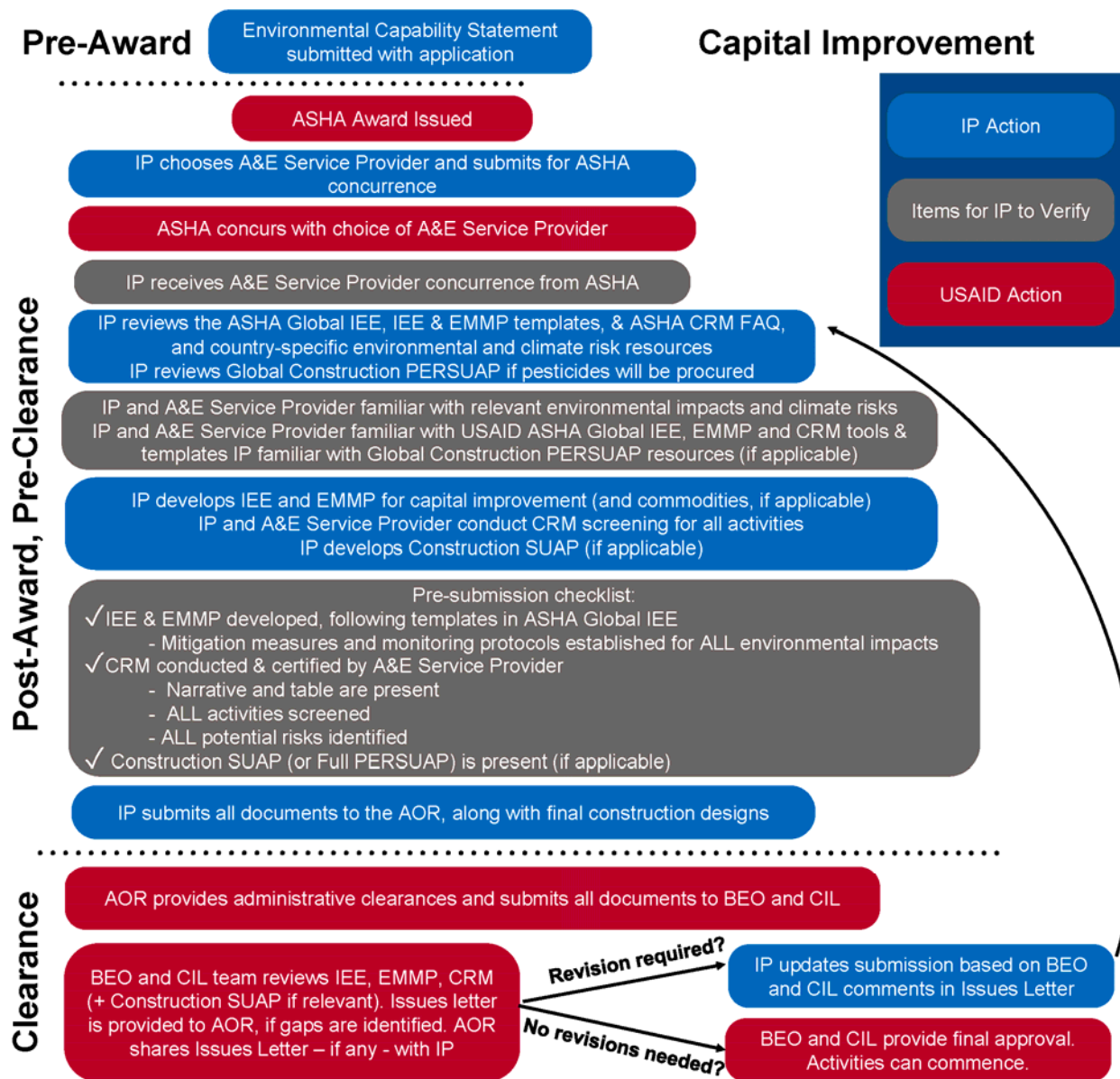


Figure 3: Capital improvement EIA process

PESTICIDES:

- **Condition 5:** Develop project-specific Construction SUAP for all procurement and/or use of pesticides

According to 22 CFR 216.3 (b)(1)(i), the procurement and/or use of termiticides, rodenticides, or other pesticides requires the development of a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP). The PERSUAP analyzes the active ingredients of proposed pesticides using 12 factors to address acute and toxicological hazards, compatibility with target and non-target organisms, and effectiveness of non-pesticide control methods as part of an integrated pest management approach.

In order to streamline the PERSUAP development process, USAID has developed the Global PERSUAP for Termite and Rodent Control in Vertical-Build Construction (also known as the “Global Construction PERSUAP”),²⁵ which conducted a 12-factor analysis of eight (8) active ingredients for termite control and one (1) active ingredient for rodent control. This Global Construction PERSUAP also outlines the application safety, training, and monitoring measures that must be followed in ASHA projects when using pesticides containing these active ingredients. The list of active ingredients for pesticides approved for use by the [Global Construction PERSUAP](#) can also be found in the template for the project-specific Construction SUAP ([Annex E](#)).

IPs who will use only active ingredients found in the Global Construction PERSUAP must develop a location- and activity-specific Construction SUAP ([Annex E](#)).

IPs who propose the use of active ingredients not found within the Global Construction PERSUAP must develop a full PERSUAP. This involves the analysis of at least the 12 factors outlined in the USAID Pesticide Procedures described in 22 CFR 216.3 (b)(1)(i). Specifically, the Pesticide Evaluation Report (PER) section addresses the 12 factors required in the USAID Pesticide Procedures. The Safer Use Action Plan (SUAP) puts the conclusions reached in the PER into a plan of action, including assignment of responsibility to appropriate parties connected with the pesticide program. A template for this full PERSUAP is provided in the [Global Construction PERSUAP](#).

It is important that all IPs preparing project-specific Construction SUAPs or full PERSUAPs are aware that it is illegal and dangerous to use a pesticide in any way not permitted by the labels. Labels will provide information such as brand name, ingredients, formulations, signal words (e.g., danger, warning, caution), directions for use, hazards to humans, animals, and the environment, personal protective equipment requirements, first aid procedures, registration number and manufacturer name and address, and net contents. The IP must include detailed information on Integrated Pest Management (IPM) strategies that will be undertaken. An understanding of the species biology and behavior is critical to designing an IPM plan. IPM is a pest control strategy that includes multiple pest control techniques (e.g., biological, physical, mechanical). Chemical controls should always be used as a last resort and in combination with other control strategies. Best practices in developing a project-specific Construction SUAP, including IPM strategies and overall chemical control can be found in Annex B (Best Practices and Integrated Pest Management for Termite and Rodent Control) of the [Global Construction PERSUAP](#).

BEO ISSUES LETTER:

- **Condition 6:** Respond to any gaps identified in the BEO Issues Letter

²⁵ USAID Global Construction PERSUAP (2018): https://ecd.usaid.gov/document.php?doc_id=51716

The BEO Issues Letter is a short memo developed by the USAID DCHA BEO and the USAID DCHA CIL outlining any gaps identified in the IPs submitted analysis during the review process. These gaps have to be addressed by the IP prior to final approval of the compliance documentation. An EMMP, IEE, CRM and/or PERSUAP or EA must be approved by the USAID DCHA Bureau Environmental Officer (BEO) prior to the implementation of medium-risk interventions (i.e., classified as a Negative Determination with Conditions as per 22 CFR 216). Upon final approval, all environmental compliance documentation is subsequently shared with the implementing partner and uploaded to the publicly accessible [Environmental Compliance Database](#).

ALL AWARDS:

- **Condition 7:** Conduct Environmental Reporting as part of ASHA QPRs

IPs must monitor the implementation and effectiveness of EMMP and CRM mitigation measures throughout the life-of-activity, through an Environmental Mitigation and Monitoring Report (EMMR) using sections 4.3 and Annex B of the ASHA Quarterly Progress Report (QPR) (see [Annex I](#)). The EMMR provides IPs with an opportunity to reevaluate the efficacy of current mitigation measures and adjust them as needed to ensure compliance with the environmental and climate risk management compliance and sustainability objectives specified in the implementing partner's compliance documents.

- **Condition 8:** Integrate Requirements into Sub-contracts for engineering, waste management, material sourcing etc.

The environmental compliance requirements associated with contracts between USAID and IPs must be passed on to subcontractors. When developing sub-contracts, IPs must include environmental compliance language and requirements within the solicitations and contracts.

The IP will ensure that subcontractors (including contractors for waste management, pesticide application, material sourcing or the ASHA-Cleared A&E Service Provider) have the capability to implement the relevant requirements of this ASHA Global IEE and the Supplemental IEE, EMMP and CRM, as applicable, as well as any PERSUAP or EA that may be developed. The IP will integrate their EMMP and CRM into their project work plan and budgets, implement their requirements, and report on their implementation as an element of regular project performance reporting in the annual ASHA QPR. The IP will assure that subcontractors and sub-grantees integrate implementation of conditions from all IEEs, EMMPs and CRMs, where applicable, into the subcontractor or subgrantee work plans and budgets and report on their implementation as an element of sub-contract or grant performance reporting. The IP will, as and if appropriate, provide training to subcontractors in their environmental compliance responsibilities and in environmentally sound design and management of their activities.

- **Condition 9:** Adhere to Partner Country Regulations

All projects must comply with regulations set by the partner country in which the project is implemented. It is the responsibility of the IP to ensure knowledge of and compliance with these regulations. Nothing in this ASHA Global IEE substitutes for or supersedes IP, sub-grantee, and subcontractor responsibility for compliance with all applicable partner country laws and regulations. The IPs, sub-grantees, and subcontractors must comply with partner country environmental regulations unless otherwise directed in writing by USAID. However, in case of conflict between partner country and USAID regulations, the most stringent requirements must be met.

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 document²⁶ and will be subject to an environmental analysis within the appropriate documents listed above.

These limitations include activities that are categorized as having a Positive Threshold Decision or a Positive Determination. A Positive Determination, pursuant to 22 CFR 216.3(a)(2)(iii) or 22 CFR 216.5, will arise if interventions are identified as having the potential to cause significant environmental effects. For such activities, USAID will require implementing partners to issue an Environmental Assessment. An example of an activity with a significant impact includes construction in or in close proximity to environmentally-sensitive areas (e.g., protected areas, wetlands, endangered species), or large-scale construction activity in an area that has not been previously developed. In such cases, the BEO will provide further guidance to the implementing partner on next steps. Alternatively, an environmental analysis that had been developed to according to host-country regulations for such activities with significant environmental risks, is equally be receivable for BEO review and approval if it meets both USAID and host-country requirements.

Other than projects/activities determined to have a Positive Threshold Decision, it is confirmed that the projects/activities described herein do not involve actions normally having a significant effect on the environment, including those described in 22 CFR 216.2(d).

Therefore, this IEE does not provide an Environmental Threshold Decision for the following activities, which would require additional supplemental analysis:

1. Large-scale activities (e.g. > 10,000 sq. ft.) on undeveloped land
2. Operation in environmentally-sensitive areas such as protected areas, wetlands and/or wildlife reserves.
3. Activities that include pesticide procurement and/or use, transport, storage or disposal which would require additional analyses pursuant to 22 CFR 216.3(b), USAID's Pesticide Procedures.

²⁶ Some bureaus use Environmental Reporting Forms or Environmental Status Forms for this purpose. ASHA does not currently utilize this method, but may in the future.

7.0 REVISIONS

Per 22 CFR 216.3(a)(9), when ongoing programs are revised to incorporate a change in scope or nature, a determination will be made as to whether such change may have an environmental impact not previously assessed. If so, this IEE will be amended to cover the changes. Per ADS 204, it is the responsibility of the USAID AOR 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.

ANNEXES

The Annexes of this ASHA Global IEE provide templates and guidance that are helpful for implementing partners (IPs) to develop project-specific environmental and climate risk management documentation. These annexes are available (FOR DOWNLOAD²⁷) on USAID's ASHA Google Drive (<https://drive.google.com/drive/folders/103ZUYH0jxuonKDUHBOCr0ShekwkwtRZD>).

[Annex A](#): Template for Environmental Capability Statement (ECS); (44KB, 1 page)

[Annex B](#): Template for Initial Environmental Examination (IEE); (56KB, 13 pages)

[Annex C](#): Template for Environmental Mitigation and Monitoring Plan (EMMP); (76KB, 24 pages)

[Annex D](#): Template and Guidance for Climate Risk Management (CRM) Screening; (874 KB, 14 pages)

[Annex E](#): Template for Construction SUAP; (61 KB, 10 pages)

[Annex F](#): Template for Water Quality Assurance (WQAP); (136 KB, 21 pages)

[Annex G](#): Form for ASHA-Cleared A&E Service Provider Certification; (55KB, 2 pages)

[Annex H](#): Form for Hosting a Green Meeting; (32KB, 1 page)

[Annex I](#): Template for the Quarterly Progress Report (QPR); (198 KB, 18 pages)

²⁷ Please ensure that you download the Word document from the drive, rather than viewing it directly online, to ensure the correct formatting is experienced.