DCN: 2011-MAC-017

U.S. Agency for International Development
INITIAL ENVIRONMENTAL EXAMINATION

Competitiveness through Clean Energy Investment
USAID Macedonia

A. PROGRAM AND ACTIVITY DATA

PROJECT NAME:	Competitiveness through Clean Energy Investment
ASSISTANCE OBJECTIVE:	Economic Growth
PROGRAM AREA:	Competitiveness
COUNTRY:	Macedonia
ORIGINATING OFFICE	Economic Growth Office
DATE:	September 20, 2011
IEE AMENDMENT: Yes ☐ No ☒	
DCN OF ORIGINAL IEE:	N/A
PURPOSE OF AMENDMENT:	N/A
IMPLEMENTATION START:	o/a February 2012
IMPLEMENTATION END:	o/a September 2015
LOP AMOUNT:	$5,225,000
AMENDMENT FUNDING AMOUNT:	N/A
CONTRACT/AWARD # IF KNOWN:	N/A

Environmental Media and/or Human Health Potentially Impacted (check all that apply):
None ☐ Air ☒ Water ☒ Land ☒ Biodiversity ☒ Human health ☒ Other ☐

Environmental Action Recommended:

Categorical Exclusion:	☒	Positive Determination:	☒
Negative Determination:	☐	Deferral:	☐
Neg. Deter. with Conditions:	☒	Exemption:	☐

B. BACKGROUND AND ACTIVITY DESCRIPTION

1. **Proposed Federal Action:** Work with the private sector in Macedonia to improve the energy business environment, increase investment in clean energy technologies, and develop the capacity of government institutions that will contribute to increased clean energy utilization.

2. **Program Objective:**

The goal of the **Competitiveness through Clean Energy Investment (CoTCEI) project** is to enhance the competitiveness of private sector, increase energy security and help the Macedonian Government meet its Climate Change obligations. This goal will be achieved through the following:

a) Improving the Energy Business Environment, specifically in the areas of
   a. streamlining the Renewable Energy Project Development and Investment process, and
   b. establishing processes for Low Emission Development;
b) Increasing the investment in Clean Energy Technologies, through
   a. increasing the investment in Energy Management, and
   b. increasing energy production from biomass waste; and
c) Developing the capacity of institutions focused on clean energy utilization.

The primary target beneficiaries of the assistance provided through this project will be Government institutions; small and medium enterprises (SMEs) with potential for improving their competitiveness by reducing energy costs; and investors in energy production from renewable energy sources.

3. **Activity Overview**

Component 1: Renewable energy project development process streamlined

Under this component, the Competitiveness through Clean Energy Investment project will engage relevant ministries and government institutions to build technical capacity and provide assistance in shaping secondary legislation and regulation to improve the renewable energy project development and investment process. Deficiencies in the this process have been and will continue to be identified based on (1) an E&E Bureau regional project that is examining the process in Macedonia and (2) the work done under a separate project to complete the Renewable Energy Action Plan for the Ministry of Economy. The formal recommendations from these projects will be provided to Ministry of Economy, and these recommendations will result in interventions, including proposed improvements to secondary legislation and regulation, improvements for technical capacity in select Ministries and Agencies, and the publication of investor guidelines.

Component 2: Processes supporting low emissions development established

This component will improve the business environment through clear direction in national strategy regarding low emissions development and improving governmental capacity to set a low emissions development framework. The ability to effectively monitor, report, and verify (MRV) emissions from the economic subsectors is a necessary function of this process. This component will focus on establishing the MRV procedures necessary to support effective low emissions development planning. Activities will focus on national data collection and reporting on greenhouse gas emissions targets, national Energy Efficiency and Renewable Energy Strategy targets, and related Energy Community targets.

Component 3: Energy management investments increased

Using the ISO 50001 energy management standard as a guideline, the principles of industrial energy management will be introduced to select Macedonia industries. Candidate industries will be identified through consultation with industrial associations and chambers of commerce, focusing on those industries that are relatively energy intensive, export oriented, and indicate a willingness to participate and/or cost share in an energy management program. A key aspect of this activity is working with industry in a systematic approach to energy use and cost reduction, as opposed to a singular focus on energy efficiency improvements. Energy management requires the continuous monitoring of energy usage in key process areas and cost centers and the analysis of these data as part of a comprehensive evaluation and tracking of energy efficiency projects. Because energy management systems require the installation of data collection and storage hardware, upfront costs are incurred before available data can be used to identify and prioritize energy and cost savings projects. As such, the initial capital outlay with no immediate return on investment may reduce the appeal of energy management systems to the risk averse industries and bankers in Macedonia in spite of the long-term cost savings that could be achieved. Therefore, communications and demonstrations will be the focus of the activity so that the benefits of energy management can be demonstrated and disseminated on a broad scale. As part of the cross-cutting theme of capacity building, component activities will address not only the target organizations and bankers, but also local engineering consulting and business consultants. The installation and on-site technical assistance for energy management systems will be provided via local contractors that will receive on-the-job training from the primary USAID contractor.

Component 4: Energy production from biomass waste increased

Household heating in rural Macedonia is primarily through fuel wood and electricity. The practice of Macedonia Public Forests, who is responsible for fuel wood supply to over 90% of the nation, is to bundle waste wood such as smaller limbs and branches left over from the harvesting process and to leave these bundles near forest access roads. The local population can remove and use this wood for a fee, but much of the wood remains unused and is left to decompose.

Macedonian electricity prices are expected to rise in the next 2-3 years. The combination of these increased electricity prices and the limited natural gas distribution network in the country has strong potential to lead to a more fuel wood-based heating. The impacts of increased electricity prices and the resultant increase in wood harvesting can both be addressed in part through a transition to wood-fired heating using higher efficiency wood pellet stoves. The pellet stoves, using available waste

wood will make more-affordable heating available while also potentially limiting wood harvesting requirements.

Activities under this component will therefore support a transition to high efficiency wood pellet stoves with waste wood-sourced pellets. These activities are expected to improve energy security and reduce greenhouse gas emissions (e.g., through the use of waste wood as opposed to firewood or primarily coal-based electricity), while directly improving the competitiveness of the local fuel pellet industry and the comfort and living conditions of families.

Component 5: Institutional capacity increased

Activities in Components 1-4 address this crosscutting component. These activities focus on improving governmental capacity to manage the project development and investment process as well as effectively collect and report upon greenhouse gas emissions. As necessary, staff within the appropriate ministries and agencies will be trained to provide the skills necessary to efficiently administer renewable energy project applications and related permitting requests; request and collect accurate greenhouse gas emissions data; and develop credible emissions reporting guidelines. Additional activities will focus on capacity building in business associations, industrial organizations, and the technical and financial service sectors. The business associations will act as partners and be a conduit for energy management training and promotional materials. Select industrial organizations, primarily SMEs, will receive cost-shared energy management systems and serve as a platform for dissemination of the benefits of energy management to other organizations. As part of these activities, organizations will also receive training in the structure of an energy management program, using ISO 50001 as a standard, and in the structuring of project proposals to approach the financial community.

Another key aspect of this implementation will be development of the technical service sector. Local engineering and business consultants will receive on-the-job training in the implementation of energy management systems and in the on-going monitoring of energy use data, energy efficiency project identification, and preparation of projects for financing. Ultimately, the banking community will also be engaged to illustrate the benefits of energy management and energy efficiency to improve, and engineering and business systems. This component will not have separate activities, and will be implemented through certain activities in components 1 through 4.

C. COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

a. Country Information (Baseline Information on the Need for the Project)

Macedonia's national security and development goals focus on ensuring reliable energy supply, sustainable economic development and competitiveness of the economy. In addition to ensuring the reliable energy supply, in the energy sector Macedonia needs to address the interconnected strategic issues of fulfilling the Energy Community and Climate Change obligations, and improving the overall economic competitiveness.

Macedonia is highly dependent on energy imports in the form of oil, natural gas, and electricity (energy share of overall imports was 20% in 2008 and 15.5% in 2009). All of Macedonia's oil and natural gas is imported, and electricity has been imported since 2000. The primary sources of energy imports are from Russia, Serbia, Slovenia, Greece and other countries. Currently, domestic energy

production covers only about 60% of demand and 40% is provided by imports. The cost of imported energy is quite high: $1.3 billion in 2008 and $765 million in 2009, including $312 million in 2008 and $115 million in 2009 for imported electricity. The situation will be exacerbated in coming years, as Macedonia's primary domestic source – lignite – the fuel for 70% of electricity generation, begins to run out. Thus, energy efficiency and the identification and development of alternative sources of energy are critical at this time.

Expanding the use of clean energy (i.e., energy efficiency and renewable energy) offers the potential to reduce energy imports, thereby improving the balance of trade and saving foreign exchange. The development and application of clean energy is a significant component of the country's energy security, which has been adopted as a strategic priority of the Government of Macedonia and especially the Ministry of Economy. Estimates have shown that implementing substantial energy efficiency measures has the potential to reduce total energy use by 6% and lower expected growth in energy consumption by 17% by 2020. Improving energy efficiency in various sectors offers the potential to improve industrial competitiveness and increase household energy affordability, especially as prices are scheduled to rise over the next few years due to the further electricity market liberalization process. This would ease the efforts for rationalizing the tariff structure and ensure stability of the electricity system. In addition, investments in renewable energy and clean technological innovation, has the potential to create new industries and jobs for Macedonia, while reducing greenhouse gas emissions.

Recognizing the seriousness of the situation, the Government of Macedonia focused on the need for rationalizing energy consumption by developing major strategic and legislative framework for energy efficiency and renewable energy over the past few years. International support for developing an enabling environment for energy efficiency has been initiated. However, energy efficiency has not gained enough priority in the Government's implementation performance while the renewable energy project development process is recognized as strenuous. To close the implementation gap and successfully improve the situation, specific action should be taken in increasing industry competitiveness by introducing energy management practices, thus reducing energy intensity of production processes; strengthening the institutions capacity; continuing the pricing reform; reducing the electricity used for heating; increasing renewable energy utilization; reducing carbon emissions by introducing new technologies; and raising awareness.

b. Baseline Environmental Information

Macedonia's economy is one of the most energy intensive in Europe due to obsolete and inefficient technologies. Macedonia's energy use is highest in the industrial and household sectors, 33.8% and 29.2% of total consumption respectively. This is followed by transport at 20.5%, and the commercial and service sectors at 13.1%. A key factor in Macedonia's high energy intensity is the heavy use of electric heating in the residential sector. Additionally, a significant number of households continue to use fuelwood in inefficient stoves for heating with adverse environmental and health effects. This fact drives the need for electricity imports, while to the extent that lignite represents such a large share of domestically-produced electricity also makes Macedonia very carbon-intensive. According to statistics, the final energy consumption per capita in Macedonia in 2006 was three times lower than the consumption in OECD countries, while the primary energy consumption per unit of GDP is almost four times higher.

An important influence on Macedonian energy policy is the overall country's objective of EU accession. After 2004, when the Stabilization and Association Agreement entered into force, Macedonia gradually moved towards meeting the EU requirements regarding the development of the energy sector. In 2006, Macedonia ratified the Energy Community Treaty. The strategic priorities of Macedonia in the energy sector are compliance with the Energy Community Treaty and the EU Directives, which are to a large extent incorporated in the new Energy Law.

D. EVALUATION OF ACTIVITY WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL AND IDENTIFICATION OF MITIGATION MEASURES

Component 1 – Renewable energy project development process streamlined

Under this component, the project will build technical capacity in relevant ministries and government institutions while providing assistance in shaping secondary legislation and regulation to improve the renewable energy project development and investment process. Activities under this component are expected to have no direct negative impact to the environment because the nature of the intervention is technical assistance and capacity building to improve host country capacity to address clean energy and climate change. The formal recommendations from this component are intended to lead to improvements to secondary legislation and regulation, improvements for technical capacity in select Ministries and Agencies, and the publication of investor guidelines, focused on the renewable energy project development process. All work performed and regulatory recommendations made under this project will be consistent with European Commission energy and environmental directives, which Macedonia is committed to adopt as a Contracting Party to the Energy Community Treaty.

Table 1 Illustrative activities under Program Component One— Renewable Energy project development process streamlined, Potential Environmental Impacts

Illustrative Activities	Potential Impacts
1.1 Technical assistance to support legal policy and regulatory reform in line with EU regulations for the simplification and timelier application of rules and procedures regarding renewable energy development	None Anticipated
1.2 Capacity building through stakeholder meetings, workshops and trainings to promote the establishment of rules and regulations in line with EU regulations for renewable energy project development and to improve capability in evaluating renewable energy projects	None anticipated
1.3 Provide quick response policy and regulatory support to Ministry of Economy	None anticipated

Component 2 – Processes supporting low emissions development established

Similar to Component 1, this component focuses on technical assistance and capacity building to assist the Government of Macedonia in low emissions planning. Efforts will be made to improve national GHG emissions inventories and the ability to perform MRV activities with respect to energy and climate change. Therefore, activities under this component are expected to have no direct negative impact on the environment and are anticipated to have beneficial impacts on the global environment.

Table 2 Illustrative activities under Program Component Two — Processes supporting low emissions development established, Potential Environmental Impacts

Illustrative Activities	Potential Impacts
2.1 Technical assistance to support legal policy and regulatory reform for the establishment of verification protocols for monitoring, reporting and verification of GHG emissions	None anticipated
2.2 Technical assistance to develop technical and legislative options for obtaining and analyzing high quality greenhouse gas emission data	None anticipated

Component 3 – Energy management investments increased

This component will introduce the principles of industrial energy management to increase energy efficiency. The activities will include assistance to select Macedonia industries through public relations, technical assistance and capacity building to industrial and financial institutions, and limited demonstration projects. As part of the cross-cutting theme of capacity building, component activities will address also build capacity in local engineering and business consultants, who will receive on-the-job training from the primary USAID contractor in the installation and operation of energy management system as well as the analysis and financial preparation of energy efficiency projects. The technical assistance aspects of this component are not expected to have negative environmental impacts. Small-scale construction will occur as part of the demonstration projects; however, minimal environmental impacts are expected. These impacts include possible disturbance of asbestos containing material and other construction hazards.

Table 3 Illustrative activities under Program Component Three — Energy management investments increased, Potential Environmental Impacts

Illustrative Activities	Potential Impacts
3.1 Promote energy management and disseminate energy management case studies through industry associations	None anticipated
3.2 Identify target demonstration organizations and establish energy management best practices	None anticipated
3.3 Install cost-shared energy management systems within selected organizations – this consists of energy usage sensors, wires, and computer software to assist in improving procedures and methods resulting in energy efficiency gains in operations.	Occupational health and safety & waste management requiring best practices, e.g. ACM or other hazardous materials may be disturbed and/or expose installers to hazardous working conditions.

Table 3 Illustrative activities under Program Component Three — Energy management investments increased, Potential Environmental Impacts	
Illustrative Activities	**Potential Impacts**
3.4 Provide ongoing technical assistance to selected organizations with respect to energy usage monitoring and consequent energy efficiency project evaluation, while also providing "on-the-job" training to local engineering and business consultants	None anticipated
3.5 Provide technical assistance with respect to energy efficiency project technical and financial preparation and approach to the financial community (ultimately assist in obtaining financing for small-scale energy management and energy efficiency projects).	• Decreased energy consumption (beneficial) • Changes to more efficient fuel sources and reductions in facility water usage (beneficial)
3.6 Install cost-shared energy efficiency upgrades within selected organizations, such as equipment replacement, efficient lighting and heating equipment, and building envelope improvements.	• Decreased energy consumption (beneficial) • Changes to more efficient fuel sources and reductions in facility water usage (beneficial) • Occupational health and safety & waste management requiring best practices, e.g. ACM or other hazardous materials may be disturbed and/or expose installers to hazardous working conditions.
3.7 Organize workshops to increase banker awareness and sophistication with respect to energy management and energy efficiency	None anticipated

4. Component 4 – Energy production from biomass waste increased

The concern regarding the impact of increased electricity prices on households without natural gas access can be addressed in part through a transition to waste biomass-fired heating using higher efficiency stoves/boilers. To support this transition, activities under this component will promote a transition to fuel wood pellet or agricultural waste -based high efficiency heating through public outreach and firm-level support. Specific activities include (1), energy efficiency, and living comfort associated with, (2) engagement of municipalities in information dissemination, and (3) facilitation of startup and/or process expansion/improvement financing for pellet and furnace makers.

Under current Macedonia Law, only individuals are allowed to collect wood waste from primary forests. The objective of this activity would be to promote pellet producers to gain access to this raw material. Promoting expansion of the pellet production could involve harvesting fallen treetops and limbs from primary forest areas on larger scale. The adverse impacts associated to this practice could include increased soil erosion, disturbance or destruction of threatened and endangered species, promote additional illegal harvesting of forest products, additional compactions of forest roads, intrusion into undisturbed forest areas. These are considered significant effects on the environment.

Furthermore, expansion of pellet production could result in additional timber taking by other means. Consequently activities under this component may lead to a significant effect on the environment.

Table 4 Illustrative activities under Program Component Four — Energy production from biomass waste increased--Potential Environmental Impacts	
Illustrative Activities	**Potential Impacts**
4.1 Support promotional campaigns regarding the cost savings of biomass fuel	Although the use of wood pellets or agriculture waste for domestic fuel may be high efficiency and result in lower air emissions, this process may result in a greater demand for forest products or have unintended consequences with respect to agricultural production.
4.2 Support production of biomass furnaces	The furnace production process may be associated with discharges to air, water and land and associated impacts on human health and the environment.
4.3 Facilitate biomass fuel producers in forest or agricultural based waste collection	Although the use of wood pellets for domestic fuel is high efficiency and results in lower air emissions, this process may result in a greater demand for forest products
4.4 Facilitate expansion of waste biomass fuel production	Although the use of wood pellets or agriculture waste for domestic fuel may be high efficiency and result in lower air emissions, this process may result in a greater demand for forest products or have unintended consequences with respect to agricultural production. Discharges from wood pellet production have yet to be defined.

5. Component 5 – <u>Institutional capacity increased</u>

Activities in Components 1-4 address this crosscutting component. These activities focus on improving governmental capacity to manage the project development and investment process as well as effectively collect and report upon greenhouse gas emissions. As necessary, staff within the appropriate ministries and agencies will be trained to provide the skills necessary to efficiently administer renewable energy project applications and related permitting requests; request and collect accurate greenhouse gas emissions data; and develop credible emissions reporting guidelines. Additional activities will focus on capacity building in business associations, industrial organizations, and the technical and financial service sectors. The business associations will act as partners and be a conduit for energy management training and promotional materials. Select industrial organizations, primarily SMEs, will receive cost-shared energy management systems and serve as a platform for dissemination of the benefits of energy management to other organizations. As part of these activities, organizations will also receive training in the structure of an energy management program, using ISO 50001 as a standard, and in the structuring of project proposals to approach the financial community.

Another key aspect of this implementation will be development of the technical service sector. Local engineering and business consultants will receive on-the-job training in the implementation of energy management systems and in the ongoing monitoring of energy use data, energy efficiency project identification, and preparation of projects for financing. Ultimately, the banking community will also be engaged to illustrate the benefits of energy management and energy efficiency. **This component will not have separate activities, and will be implemented through certain activities in components 1 through 4. Thus the environmental determination for the other components applies here as well.** Some of the provided assistance may be geared toward the energy and water, construction, industrial and manufacturing, or forestry and agriculture sectors, which are known to pose significant effects on the environment. The results of any environmental assessment and the environmental mitigation and monitoring plans will be used to inform specific interventions.

Table 5 Illustrative activities under Program Component Five — Institutional Capacity Increased --Potential Environmental Impacts	
Illustrative Activities	**Potential Impacts**
5.1 Training and capacity building of government and business associations to administer and monitor program outcomes	None anticipated
5.2 On-the-job training in the implementation of energy management systems	None anticipated

E. RECOMMENDED ENVIRONMENTAL ACTION

1. Recommended Environmental Threshold Determinations:

Categorical Exclusion

Activities under Components 1 and 2 and Component 3 activities 3.1, 3.2, 3.4 and 3.6 and associated activities under Component 5 are not connected to the remaining components and are not subject to the ESS and the EA. A categorical exclusion is recommended for these activities pursuant to 216.2(c)(2)(xiv) for studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities). No further environmental review is required for these activities.

Negative Determination with Conditions

Activities 3.3, 3.5, and 3.6 and associated activities under Component 5 are not connected actions to activities subject to a positive determination. However, these activities have the potential to result in significant environmental effects unless appropriate mitigation measures are adopted. Thus, these activities are subject to a negative determination with conditions pursuant to 22 CFR 216.3(a)(2)(iii).

Positive Determination

A Positive Determination is recommended for Component 4, Energy production from biomass wastes increased, pursuant to 22 CFR 216.5, endangered species and the Section 119 of the Foreign

Assistance Act. An Environmental Scoping Statement (Scoping Statement) must be prepared pursuant to 22 CFR 216.3(4) and an Environmental Assessment (EA) must be prepared pursuant to 22 CFR 216.6 for all activities under this Component.

2. Conditions and Mitigation Measures

a. Activities 3.3, 3.5, and 3.6 for Component 3, Energy management investments increased, and associated activities under Component 5 are subject to a Negative Determination with Conditions. The project implementer will develop an environmental report (See attached example ER template) that analyzes environmental impacts. The ER shall include an environmental mitigation and monitoring plan (EMMP) and shall cover items associated with small-scale energy management and energy efficiency projects, including health and safety & waste management requiring best practices, e.g. ACM or other hazardous materials may be disturbed and/or expose installers to hazardous working conditions. The ER shall also include a Site Specific Environmental Compliance Plan (ECP) template tailored to this particular set of activities and a Record of Compliance template (See attached example template). The ER shall be approved by the Mission Environmental Officer (MEO) and the BEO.

   The implementer shall prepare an ECP for each of the Activity 3.3 subproject activities to be approved by MEO with a copy to the BEO. After completion of the subproject, the implementer shall submit a Record of Compliance for each subproject to the AOTR/COTR, certifying adherence to the ECP. These records shall be kept in the project files and copied to the MEO. Copies of these documents must be made available to the BEO upon request.

b. Activities under Component 4 are subject to a Positive Determination environmental threshold decision.

   The BEO must approve the Statement of Work for preparation of the Scoping Statement and EA. In addition, the BEO must review and clear on the staffing and qualifications of team preparing the ESS and EA.

   A Scoping Statement must be prepared per 22 CFR 216.3(4) and approved by the BEO. It shall identify environmental impacts, alternatives, and eliminate from further consideration impacts that will not be evaluated (Please see attached Scoping Statement Template).

   Based on the Scoping Statement, an EA per 22 CFR 216.6 shall be prepared for the purpose of ensuring that environmental consequences and their significance are known and clearly identified prior to the start of additional activities in Component 4. The EA shall include baseline environmental information that can serve as the basis for future monitoring; an analysis of alternatives to the proposed action for each sector or type of activity; and a comparison of environmental effects associated with each alternative. The baseline environmental information shall include requirements of national and local laws and local permitting requirements for the activities. The EA also shall evaluate whether special geographic or ecosystem areas exist where project implementation should be

excluded in order to avoid significant effects. The EA shall outline the criteria for determining whether a site-specific EA must be prepared for individual projects, which are project-funded and may have significant effects on the environment. It shall also include an EMMP for identified environmental impacts. (Please see attached Environmental Assessment Template).

If multiple subprojects are envisioned under this activity, the EA shall also include Site Specific Environmental Compliance Plan and Record of Compliance templates tailored to the project level EMMP to site specific conditions. The Europe and Eurasia Bureau Environmental Officer (BEO) must approve the EA before the project activities covered in the scope of the EA can proceed.

For subprojects, implementers must prepare ECPs to be approved by the MEO with a copy to the BEO. After completion of the subproject, the implementer shall submit a Record of Compliance to the AOTR/COTR, certifying adherence to the ECP. These records shall be kept in the project files and copied to the MEO. Copies of these documents must be made available to the BEO upon request.

If at any time during the course of project implementation it is determined that a site-specific EA is necessary for a particular activity, the implementer must prepare a supplemental ESS and EA for BEO approval.

3. Monitoring

- The AOTR/COTR with the support of the MEO is responsible for monitoring compliance of site specific activities with the EA and the EMMP by means of inspections and reviews of Site-Specific Compliance Plans and Records of Compliance.
- The BEO or his/her representative must monitor the project annually to ensure compliance.
- A summary report of USAID/Macedonia compliance relative to this IEE will be sent to the EE/BEO through the COTR and MEO on an annual basis in conjunction with preparation of the Mission's annual environmental compliance report.
- The COTR and the MEO shall conduct regular project site visits to ensure that provisions of any and all EMMPs are being followed during project implementation.

F. MANDATORY INCLUSION OF ENVIRONMENTAL COMPLIANCE REQUIREMENTS IN SOLICITATIONS, AWARDS, BUDGETS AND WORKPLANS

- The requirements for environmental compliance listed above shall be included in solicitations and awards to ensure funding and staffing to satisfy the environmental compliance requirements set forth in this IEE.
- Environmental mitigation and monitoring requirements shall also be included in solicitations and awards.
- Implementing partners will incorporate conditions set forth in this IEE in to their work plans and an indicator for environmental compliance shall be included as part of the project's performance monitoring plan.

G. LIMITATIONS OF THE IEE:

This IEE does not cover activities involving:

1. Classes of actions normally having a significant effect on the environment pursuant to 22 CFR 216.2(d)(1):
    i. Programs of river basin development;
    ii. Irrigation and water management;
    iii. Agricultural land leveling
    iv. Drainage projects
    v. Large scale agricultural mechanization
    vi. Resettlement Projects
    vii. New land development
    viii. Penetration road building and road improvement
    ix. Power plants;
    x. Potable water and sewerage projects
2. Support to extractive industries (e.g. mining and quarrying).
3. Activities involving support for regulatory permitting;
4. Activities involving privatization of industrial or infrastructure facilities;
5. Activities supporting project preparation, project feasibility studies, engineering design, to in support of any activity listed in 22 CFR 216.2(d)(1);
6. Assistance for the procurement (including payment in kind, donations, guarantees of credit) or use (including handling, transport, fuel for transport, storage, mixing, loading, application, cleanup of spray equipment, and disposal) of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials. Pesticides cover all insecticides, fungicides, rodenticides, etc. covered under FIFRA – 'Federal Insecticide, Fungicide, and Rodenticide Act';
7. Procurement or use of genetically modified organisms (GMOs);
8. DCA or GDA programs.

Any of the above actions would require an amendment to the IEE approved by the E&E Bureau Environmental Officer (EE/BEO).

H. REVISIONS

Pursuant to 22 CFR 216.3(a) (9), if new information becomes available that indicates that activities covered by the IEE might be considered "major" and their effect "significant," or if additional activities are proposed that might be considered "major" and their effect "significant," these environmental threshold decisions will be reviewed and, if necessary, revised by the Mission with concurrence by the BEO. It is the responsibility of the USAID COTR/AOTR to keep the MEO and BEO informed of any new information or changes in the activity that might require revision of the IEE.

I. RECOMMENDED ENVIRONMENTAL THRESHOLD DECISION

Activities under Components 1 and 2, and associated activities under Component 5, are not connected to the remaining components and are not subject to the ESS and the EA. A categorical exclusion is recommended for these activities pursuant to 216.2(c)(2)(xiv) for studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities).

A Negative Determination with Conditions is recommended for Component 3.3, 3.5, and 3.6 and associated activities under Component 5.

A Positive Determination is recommended for activities under Component 4, in accordance with Section 117 of the Foreign Assistance Act which mandates USAID shall take fully into account the impact of such programs and projects upon the environment and natural resources and pursuant to FAA 119 for protection of biodiversity and 22 CFR 216.5 related to endangered species. Pursuant to 22 CFR 216.3(a)(4)(iv), if it becomes evident that the action will not have significant effects on the environment, the Positive Threshold Decision may be withdrawn with the concurrence of the BEO.

USAID Approval of Recommended Environmental Threshold Decision:

Approval :	Robert Wuertz, Mission Director	9/27/2011 Date
Approval:	Joseph Lessard, EG Office Director	9.27.2011 Date
Approval :	Yasmeen Thomason, MEO	9/28/2011 Date
Approval :	Margareta Lipkovska, Activity Manager/COTR	09/21/2011 Date
Approval:	Steven Burns, Preparer	by e-mail 09/21/2011 Date
Concurrence:	Jerry Bisson E&E Acting Bureau Environmental Officer	09-28-2011 Date

Distribution:
IEE File
Mission Environmental Officer

Attachments:

Attachment 1: Environmental Report Template
Attachment 2: Environmental Scoping Statement Template
Attachment 3: Environmental Assessment Template
Attachment 4: Site Specific Environmental Compliance Plan and Record of Compliance Template

Template are avalable on the USAID E&E Environmental Compliance Intranet under « tools »

Attachment 1: Environmental Report Template

ENVIRONMENTAL REPORT:

Energy management investments

Implemented under: Competitiveness through Clean Energy Investment

DCN: 2011-MAC-017

Date

DISCLAIMER

The author's views expressed in this publication do not necessarily reflect the views of the United States Agency for International Development or the United States Government

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1 INTRODUCTION

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1.2 Project Context

1.2.1 Location information

1.2.2 Beneficiaries (e.g. size of community, number of school children, etc.)

1.2.3 Number of Employees (if this is a business) and Annual Revenue (or ranges of revenue and employment if for several businesses)

1.2.4 Subproject or Activity Timeframe and Schedule

1.2.5 Detailed Description of Activity and Site(s) (e.g. size of the facilities/land area; steps that will be taken to accomplish the activity)

1.2.6 Map of Site(s) (*Provide an image from Google Earth of the location and site photos*)

1.2.7 Photos of Site(s)

1.3 Summary of IEE, Environmental Threshold Determination

2 AFFECTED ENVIRONMENT

2.1 Population Characteristics

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2.1.2 Ethnicity

2.1.3 Gender

2.1.4 Age Distribution

2.1.5 Socioeconomic Characteristics

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2.7.2 Environmental Studies of Affected Area

2.8 Policy, Legal, Regulatory and Permitting Requirements

2.8.1 Relevant and Application Host Government Policy, Legal and Regulatory Requirements

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2.8.2.1 Host government environmental laws or environmental standards with which activities will have to comply with

2.8.2.1.1 Air emission standards

2.8.2.1.2 Water discharge standards

2.8.2.1.3 Solid waste disposal or storage regulations

2.8.2.1.4 Hazardous waste storage and disposal

2.8.2.1.5 Historical or cultural preservation

2.8.2.1.6 Other

2.8.2.2 U.S., European Union (EU) or other international standards with which the subproject/activity must comply.

2.8.3 Relevant and Applicable Permitting Requirements

Permit Type	Schedule	Responsible Party
Zoning		
Building/Construction		
Source Material Extraction		
Waste Disposal		
Wastewater		
Air		
Water Use		
Historical or Cultural Preservation		
Wetlands or Water bodies		
Threatened or Endangered Spp.		
Other		

2.9 Natural Resources

2.9.1 Climate

2.9.2 Air

2.9.3 Water Resources

2.9.4 Ground Water

2.9.4.1 Quality

2.9.4.2 Availability

2.9.5 Surface Water

2.9.5.1 Quality

2.9.5.2 Availability

2.9.6 Wildlife

2.9.6.1 Endangered, threatened and protected species

2.9.6.2 Avian Wildlife

2.9.6.3 Aquatic Life

2.9.6.3.1 Plants

2.9.6.3.2 Fish Species

2.9.6.3.3 Invertebrates

2.9.6.4 Terrestrial Life

2.9.6.4.1 Plants

2.9.6.4.2 Animals

2.9.6.4.3 Invertebrates

2.9.7 Land Resources

2.9.7.1 Forests

2.9.7.2 Coastal Areas

2.9.7.3 Mountainous Areas

2.9.7.4 Agricultural Land

2.9.7.5 Urban Areas

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3.1.2 Indirect Effects and their Significance

3.1.3 Cumulative Effects and their Significance

3.1.4 Area of Land Disturbance

3.1.5 Possible Conflicts between Proposed Action and Land Use Plans

3.1.6 Possible Conflicts between Proposed Action and Policies and Controls for Areas Concerned

3.1.7 Energy Requirements and Conservation Potential of Various Alternatives and Mitigation Measures

3.1.8 Natural or Depletable Resource Requirements

3.1.9 Conservation Potential of Various Requirements and Mitigation Measures

3.1.10 Urban Quality

3.1.11 Historic and Cultural Resources

3.1.12 Design of the Built Environment, including Reuse and Conservation Potential of Various Alternatives and Mitigation Measures

Example: Summary of Environmental Effects			
Project Phase	**Action**	**Impact**	**Environmental Consequences**
Siting			
	Sited in a Flood Plain		
		Flooding	Threats to health and safety of users
			Degradation or loss of structure
		Impermeable surface	
			Increased surface water run off potentially increasing flood risks
			Increase risk of contaminated run off into river adversely affecting aquatic life
	Sited Adjacent to a Road		
		Road traffic affects site access	Accidents lead to adverse impacts on public health
		Sports players run into oncoming traffic	Accidents lead to adverse impacts on public health
	Sited in area with unstable geology	Landslides and structural collapse	Accidents lead to adverse impacts on public health
Designs, Specifications and Plans			
	Facility Design		
		Inappropriate design leads to lack of structural integrity	Structural failure posing adverse impacts to public health
		Failure to Account for Seismic Activity	Structural failure posing adverse impacts to public health
	Composition of Materials		

3.2 Significance of Identified Environmental Effects

Significance Determination for Potential Environmental, Health, and Safety Effects

Project Activity	Potential Effects	Significance Determination Filter[1]				Are Effects Significant? (Y)es or (No)	Notes/Comments
		1. Subject of USAID or Host Country Requirements[2]	2. Subject of Community Concern	3. Pollution Prevention Potential[3]	4. High Environmental Risk (high severity, frequency, or duration)[4]		

[1] Place an "X" in the appropriate column 1, 2, 3, or 4. Starting with Column 1, and proceeding to Column 4. A single "X" (the first one determined) is all that is required for a determination of significance.
[2] Subject to USAID or FAA requirements, e.g., endangered species, climate change impacts, etc. or specifically relevant legislation, regulation, and/or permit requirements. This will likely include effects associated with activities if (1) environmental regulations specify controls and conditions, (2) information must be provided to authorities, and/or (3) there may be periodic inspections or enforcement actions taken by authorities.
[3] Based on technical and business conditions, such as cost-effectiveness, has a high-potential for pollution prevention or resource-use reduction
[4] Associated with potential impact to the environment from high environmental loading due to one or more of the following: amounts, frequency, duration, and severity (see attached worksheet).

	Environmental Risk Determination[5]				
Effects	Scale	Severity	Probability	Duration	**Avg. Score[6]**
Earth Resources					
Grading, trenching, or excavation effects					
Increased risk of geologic hazards					
Contaminated soils or ground water effects					
Introduction of offsite overburden/waste disposal or borrow pits					
Loss of useable farmland					
Generation of solid or hazardous waste					
Other earth resource effects					
Industries (including Agrochemical) and Agriculture					
Use of inputs such as seeds and fertilizers					
Increased run-off and run-on stormwater					
agricultural intensification or extensification					
Other industry/agriculture effects					
Air Quality					
Increased air pollutant emissions, including dust from traffic					
Disturbance of asbestos-containing materials					
Release of ozone depleting substances					
increased odor					
alteration of microclimate					
Other air quality effects					
Water Resources and Quality					
Increased surface or ground water withdrawal					
Discharge of waste water or potentially contaminated stormwater (including suspended solids)					
Increased deposition or removal of fill (rivers, streams, wetlands, lakes)					
Spills of liquid fuels or hazardous materials					
Other water resource effects					

[5] Use attached table, Definitions Used in Determining Environmental Risk

[6] Determine average score above which the projects will determine the effect significant based on environmental risk.

Historic or Cultural Resources					
Effects on prehistoric, historic, or paleontological resources					
Effects on unique cultural or ethnic values					
Biological Resources					
Vegetation loss, especially in wetlands or riparian areas					
Increased use of pesticides/rodenticides, insecticides, or herbicides					
Loss of threatened or endangered species or their habitats					
Other biological resource effects					
Planning and Land Use					
Potential conflicts with adjacent land uses or zoning regulations					
Light, noise, or radiation pollution					
Dislocation of human communities					
Interruption of necessary utility or municipal service					
Loss or inefficient use of mineral or non-renewable resources					
Use of energy from non-renewable sources					
Water drainage interference					
Utility transmission interference (above- and below-ground cables; water, sewer and gas lines; etc.					
Other planning and land use effects					
Traffic, Transportation and Circulation					
Increase in vehicle trips					
Increased safety hazards					
Impeded access for people or traffic					
Other traffic, transportation, and circulation effects					
Hazards					
Increase risk of fire, explosion, or hazardous chemical release					
Releases from PCB-containing equipment (e.g., transformers, florescent light ballasts, etc.)					
Increased public health hazard (including creation of medical wastes)					
Increased occupational safety and health hazard					
Other hazard effects					

Definitions Used in Determining Environmental Risk

Parameter	Rating Categories				
	1	**2**	**3**	**4**	**5**
Scale	Insignificant volume/quantity	Low volume/quantity	Medium volume/quantity	Medium volume/quantity	High volume/quantity
Severity	Minimal impact	Moderate impact but localized and readily containable	Moderate impact over multiple locations	Significant impact and/or regional	Extreme impact and/or potential for global impact
Probability	Very unlikely under any operating condition	Occurs during abnormal/emergency conditions. Probability anticipated and managed	Occurs during routine maintenance activities	Occurs during major maintenance activities	Occurring during normal operating conditions
Duration	Spike situation extremely short-term duration within one day	Less than one month	One to six months	Less than one year	Long-term duration greater than one year or continuous

3.3 Adverse Impacts that Cannot Be Avoided

3.4 Irreversible and Irretrievable Commitment of Resources

4 ENVIRONMENTAL MITIGATION AND MONITORING PLANS

4.1 Environmental Mitigation Plan

Activity	Identified Environmental Impacts	Are Impacts Potentially Significant?	Mitigation Measure(s)	Monitoring Indicator(s)
List all site activities or processes (e.g. asbestos roof removal, installation of toilets, remove and replace flooring) A line must be included for each activity or process that is identified.	Include a separate sub-line for each environmental impact associated with a single activity or process	Indicate (Y)es or (N)o If no, provide justification, such as: --does not exceed existing background conditions --does not exceed applicable legal limits --does not pose a risk because of low severity, frequency, or duration	Describe the mitigation measures that will offset the associated environmental impact. If mitigation measures are well-specified in the IEE, quote directly from IEE If they are not well-specified in the IEE, define more specifically here.	Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)

4.2 Environmental Monitoring Plan

Monitoring Indicator(s)	Monitoring and Reporting Frequency	Responsible Party(ies)	Records Generated
Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)	For example: "Monitor weekly, and report in quarterly reports. If XXX occurs, immediately inform USAID activity manager."	If appropriate, *separately* specify the parties responsible for mitigation, for monitoring and for reporting.	If appropriate, describe types of records generated by the mitigation, monitoring, and reporting process.

5 Approvals

Implementer Project Director/COP: _____ Date: _____
(name)

USAID/Project COTR/AOTR: _____ Date: _____
(name)

USAID/MEO: _____ Date: _____
(name)

USAID/Bureau Environmental Officer: _____ Date: _____

6 APPENDICES

US Agency for International Development
1300 Pennsylvania Avenue, NW
Washington, DC 20523
Tel: (202) 712-0000
Fax: (202) 216-3524
www.usaid.gov

Attachment 2: Environmental Scoping Statement Template

ENVIRONMENTAL SCOPING STATEMENT:

Energy production from biomass waste

Implemented under: Competitiveness through Clean Energy Investment
DCN: 2011-MAC-017

This report was prepared for the United States Agency for International Development

Principal Contacts:

Date

DISCLAIMER

The author's views expressed in this publication do not necessarily reflect the views of the United States Agency for International Development or the United States Government

This is a suggested template to use when preparing an Environmental Scoping Statement pursuant to 22 CFR 216.3(a)(4). The purpose of the Scoping Statement is to identify the significant issues relating to the proposed action and to determine the scope of the issues to be addressed in the Environmental Assessment prepared in accordance with 22 CFR 216.6. It is to document the public scoping process, identify the alternatives to be considered in an Environmental Assessment (EA), identify the significant effects to be considered in the EA, and to eliminate from further consideration discussion of environmental effects that are not significant and not to be considered in the EA. The EA must be based on the Scoping Statement.

This template is NOT intended to be used as an environmental review checklist, but rather is designed to guide the preparer through the preparation process. Every project is different, and consequently every Scoping Statement and EA will be different with respect to length and complexity. Scoping statements can range from essentially a basic outline of an Environmental Assessment to including a detailed and complex technical analysis. Expert knowledge of environmental effects associated with the type of federal action being considered in a Scoping Statement and EA should drive the content of each. The content that is required to be included in Scoping Statements is highlighted in pink.

Please note that the Scoping Statement must be approved by the Bureau Environmental Officer prior to initiation of the Environmental Assessment. A Scoping Statement alone cannot meet the 22 CFR 216 requirements for an Environmental Assessment. In each and every case, both a Scoping Statement and Environmental Assessment must be approved by the Bureau Environmental Officer before activities of a proposed action with a Positive Determination environmental threshold decision can be initiated.

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(Provide names, disciplines, and qualifications.)

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US Agency for International Development
1300 Pennsylvania Avenue, NW
Washington, DC 20523
Tel: (202) 712-0000
Fax: (202) 216-3524
www.usaid.gov

Attachment 3: Environmental Assessment Template

ENVIRONMENTAL ASSESSMENT:

Energy production from biomass waste

Implemented under: Competitiveness through Clean Energy Investment
DCN: 2011-MAC-017

This report was prepared for the United States Agency for International Development

Principal Contacts:

Date

DISCLAIMER

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This is a suggested template to use when preparing an Environmental Assessment (EA) pursuant to 22 CFR 216.6. ***This template is NOT intended to be used as an environmental review checklist.*** Every project is different, and consequently every Scoping Statement and EA will be different. Expert knowledge of environmental effects associated with the type of federal action should drive the content of the EA.

22 CFR 216.6 does include specific EA content. The required content that is required is highlighted in pink. Other issues, concerns and topic areas are added to encourage preparers to think about these issues and determine whether they are relevant to the EA. However, every project is different and consequently every EA will be different. The significant issues to be discussed in the EA should be outlined in the Scoping Statement. Thus, the actual EA should be based on the Scoping Statement for specific projects.

Please note both a Scoping Statement and Environmental Assessment must be approved by the Bureau Environmental Officer prior to initiating any federal action with a Positive Determination environmental threshold decision.

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Describe screening criteria and process for eliminating alternatives

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9.4.3.3 Environmental Impacts

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	Example: Score Ranking of Environmental Impacts (1=Low; 2=Intermediate; 3=High)		
Potential Environmental Impact **(Included All Environmental Consequences Noted in Tables Above)**	Alternative 1	Alternative 2	Alternative 3
Consequence 1			
Consequence 2			
Consequence 3			
Consequence 4			
Total Score			

10 AFFECTED ENVIRONMENT—Note that the affected environment depends on the specific project. issue areas below those that might be considered.

10.1 Population Characteristics

10.1.1 Size

10.1.2 Ethnicity

10.1.3 Gender

10.1.4 Age Distribution

10.1.5 Socioeconomic Characteristics

10.1.6 Description of Project Beneficiaries

10.2 Public Health Status

10.3 Socioeconomic Status

10.4 Geographic Characteristics

10.5 Land Use Characteristics

10.6 Cultural or Historic Resources

10.7 Environmental Baseline Information

10.7.1 Forestry and Biodiversity

10.7.2 Endangered, Threatened and Protected Species and their Habitats

10.7.3 Protected Areas and National Parks

10.7.4 Environmental Data

10.7.5 Environmental Studies of Affected Area

10.8 Policy, Legal, Regulatory and Permitting Requirements

10.8.1 Relevant and Application Host Government Policy, Legal and Regulatory Requirements

10.8.2 Relevant and Applicable International Standards and Best Practices

10.8.3 Relevant and Applicable Permitting Requirements

10.9 Natural Resources

10.9.1 Climate

10.9.2 Air

10.9.3 Water Resources

10.9.4 Ground Water

10.9.4.1 Quality

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11.1.15 Design of the Built Environment, including Reuse and Conservation Potential of Various Alternatives and Mitigation Measures

11.1.16 Means to Mitigate Adverse Environmental Impacts--(This information could be included in Section 6)

Example: Summary of Environmental Consequences Associated with Alternative 1 (Complete for Each Alternative)			
Project Phase	**Action**	**Impact**	**Environmental Consequences**
Siting			
	Sited in a Flood Plain		
		Flooding	Threats to health and safety of users
			Degradation or loss of structure
		Impermeable surface	
			Increased surface water run off potentially increasing flood risks
			Increase risk of contaminated run off into river adversely affecting aquatic life
	Sited Adjacent to a Road		
		Road traffic affects site access	Accidents lead to adverse impacts on public health
		Sports players run into oncoming traffic	Accidents lead to adverse impacts on public health
	Sited in area with unstable geology	Landslides and structural collapse	Accidents lead to adverse impacts on public health
Designs, Specifications and Plans			
	Facility Design		
		Inappropriate design leads to lack of structural integrity	Structural failure posing adverse impacts to public health
		Failure to Account for Seismic Activity	Structural failure posing adverse impacts to public health
	Composition of		

Example: Summary of Environmental Consequences Associated with Alternative 1 (Complete for Each Alternative)			
Project Phase	**Action**	**Impact**	**Environmental Consequences**
	Materials		
		Inappropriate materials lead to lack of structural integrity	Structural failure posing adverse impacts to public health
	Worker Health and Safety		
		Lack of Worker Health and Safety Plans and Protective Equipment	Increased risk of occupation accidents resulting in adverse impacts on worker health
Site Preparation and Staging			
	Storage of Construction Materials		
		Improper storage results inappropriate access	Risk of accidents to unauthorized individuals
	Site Access Control		
		Lack of control over site access leads to authorized entry into construction area	Risk of accidents to unauthorized individuals
Construction Phase			
	Use of Heavy Duty Construction Equipment and Transport Vehicles		

Example: Summary of Environmental Consequences Associated with Alternative 1 (Complete for Each Alternative)			
Project Phase	**Action**	**Impact**	**Environmental Consequences**
		Increased Traffic	Short term nuisance to nearby residents, students, patients, hospital workers and shop owners
		Increased Noise	Short term nuisance to nearby residents, students, patients, hospital workers and shop owners
		Increase Air Emissions	Workers, area residents, students, patients, hospital workers and shop owners exposed to carbon monoxide, carbon dioxide, sulfur dioxide and nitrogen dioxide emissions. In places where leaded gasoline is used they are also exposed to lead.
		Fuel and Oil Spills	Fuel and oil spills contaminate land and water resources adversely affecting terrestrial and aquatic life
	Demolition and Cleaning		
		Use of Explosives	
			Potential for worker accidents
			Risk of explosions due to onsite storage

Example: Summary of Environmental Consequences Associated with Alternative 1 (Complete for Each Alternative)			
Project Phase	**Action**	**Impact**	**Environmental Consequences**
			Risk of uncontrolled fires due to use of explosives
		Increased Noise	
			Short term nuisance to nearby residents, students, patients, hospital workers and shop owners
		Increased solid wastes	
			Adverse impacts to water bodies from inappropriate disposal of debris
			Adverse impacts to land from inappropriate disposal of debris
		Lack of protective equipment or improper work practices	
			Increased risk of occupation accidents resulting in adverse impacts on worker health
		Disturbance of Asbestos containing building materials	Increased risk of asbestosis among facility users and workers resulting from exposure to disturbed friable asbestos fibers
	Disposal of Waste Material		
		Improper waste disposal	

Example: Summary of Environmental Consequences Associated with Alternative 1 (Complete for Each Alternative)			
Project Phase	**Action**	**Impact**	**Environmental Consequences**
			Adverse impacts to water bodies from inappropriate disposal of debris
			Adverse impacts to land from inappropriate disposal of debris
		Improper disposal of hazardous materials such as asbestos containing building materials, paint, and solvents	Hazardous waste contamination of land and water
			Public health impacts from inhalation exposure to asbestos and solvent contaminated drinking water
Construction Phase			
	Site Excavation		
		Generation of Solid Waste	
			Adverse impacts to water bodies from inappropriate disposal of debris
			Adverse impacts to land from inappropriate disposal of debris
		Disturbance of Underground Utilities	

Example: Summary of Environmental Consequences Associated with Alternative 1 (Complete for Each Alternative)			
Project Phase	**Action**	**Impact**	**Environmental Consequences**
			Increased risk of worker accidents due to explosions or electrocution
		Disturbance of Ground Water Resources	
			Increased risk of drinking water contamination affecting public health of area residents
	Dig Trenches, Canals and Borrow Pits		
		Lack of protective equipment or improper work practices	Increased risk of occupation accidents resulting in adverse impacts on worker health
		Disturbance of Underground Utilities	Increased risk of worker accidents due to explosions or electrocution
		Disturbance of Ground Water Resources	Increased risk of drinking water contamination affecting public health of area residents
		Uncontrolled access to trenches, canals and borrow pits	Increased risk of accidents and adverse impacts to public health
	Grading		
		Improper grading	Landslides or structural failure leads to accidents and adverse impacts to public health

Example: Summary of Environmental Consequences Associated with Alternative 1 (Complete for Each Alternative)			
Project Phase	**Action**	**Impact**	**Environmental Consequences**
		Lack of protective equipment or improper work practices	
	Filling		
		Use of Improper Fill	Landslides or structural failure leads to accidents and adverse impacts to public health
		Lack of protective equipment or improper work practices	Increased occupational hazards leads to adverse impacts to worker health
	Electricity		
		Increased risk of electrocution	Impacts to worker safety
		Improper wiring leads to fire and electrocution risk	Fire hazard to facility users
	Plumbing		
		Improper installation of leads to facility water damage	Public health impacts from exposure to mold
		Improper installation leads to sewerage backups	Public health impacts from exposure to sewerage
	Foundation		
		Improper installation compromises structural stability	Risk of structural failure poses health and safety risk to facility users
	Drainage System		

Example: Summary of Environmental Consequences Associated with Alternative 1 (Complete for Each Alternative)			
Project Phase	**Action**	**Impact**	**Environmental Consequences**
		Improper Drainage leads to erosion and facility damage or destruction	Accidents from facility failure lead to adverse impacts on public health
		Improper Drainage leads to sewerage backup	Exposure to raw sewerage leads to water borne disease
	Toilet Facilities		
		Improper siting leads to cross contamination	Public health impacts from insect transmitted disease
	Kitchen Facility	Improper siting leads to cross contamination	Public health impacts from insect transmitted disease
	Paint	Lead based paint is used	Public health impacts from lead exposure
	Windows and Doors	Use of formaldehyde containing windows and doors	Public health impacts from formaldehyde inhalation exposure
Site Demobilization			
	Site Clean Up		
		Failure to remove all construction and debris	
			Adverse impacts to water bodies from inappropriate disposal of debris
			Adverse impacts to land from inappropriate disposal of debris
		Improper Waste Disposal	

Example: Summary of Environmental Consequences Associated with Alternative 1 (Complete for Each Alternative)			
Project Phase	**Action**	**Impact**	**Environmental Consequences**
			Adverse impacts to water bodies from inappropriate disposal of debris
			Adverse impacts to land from inappropriate disposal of debris
Facility Handover			
	Long Term Maintenance	Failure to Ensure Recipient Commitment for Long Term Operation and Maintenance	Longer term risks to public health from accidents due to structural failures

11.2 Comparison of Environmental Effects of the Alternatives

11.2.1 Summary

(provide a summary discussion of how the environmental consequences of the alternatives compare)

	Example: Score Ranking of Environmental Impacts (1=Low; 2=Intermediate; 3=High)		
Potential Environmental Impact **(Included All Environmental Consequences Noted in Tables Above)**	Alternative 1	Alternative 2	Alternative 3
Consequence 1			
Consequence 2			
Consequence 3			
Consequence 4			
Total Score			

COMPARISON OF ENVIRONMENTAL IMPACTS – LAND DISTURBANCE AREA

Alternative	Footprint of Contaminated/Restricted Use Area	Total Land Disturbance Area (m^2)
Alternative 1		
Alternative 2		
Alternative 3		

11.2.2 Comparison of Remedies Available for the Environmental Consequences of Alternatives

This section should provide a discussion of the environmental consequences for each of the alternatives

Comparison of Alternatives: Whether Environmental Consequences Can Be Mitigated						
	Alternative 1	**Effect Can Be Mitigated**	**Alternative 2**	**Effect Can Be Mitigated**	**Alternative 3-- No Action**	**Effect Can Be Mitigated**
Lack of clean drinking water raises risk of water borne disease	Significant	Yes	None	NA	None	
Surface or Ground Water Contamination from improper disposal of solid and hazardous wastes						
Impacts to terrestrial and aquatic life due to improper disposal of solid and hazardous wastes						
Land and Water Contamination Due to Fuel and Oil Spills						
Public Health Impacts Due to Structural Instability						
Public Health Impacts Due to Exposure to Building Materials Containing Toxic Substances						
Public Health Risk Resulting from poor drainage and toilet location						
Public Health Impacts Due to Improper Control of Construction Site						
Public Health Impacts Due to Improper Closure of trenches, pits and canals						
Worker Health Impacts from explosions, electrocution and fire						

Worker health risks from lack of use of proper protective equipment and measures during construction						
Short term nuisance to nearby residents, students, patients, hospital workers and shop owners						
Workers, area residents, students, patients, hospital workers and shop owners exposed to carbon monoxide, carbon dioxide, sulfur dioxide and nitrogen dioxide emissions. In places where leaded gasoline is used they are also exposed to lead.						

11.2.3 Overall Comparison of Alternatives with Respect to Feasibility, Ability to Meet Project Goals, Environmental Impact Ranking, Costs, and Schedule for Completion

TABLE 1: SUMMARY COMPARISON OF ALTERNATIVES

ALTERNATIVE	FEASABLE	MEETS PROJECT GOALS	ENVIRONMENTAL IMPACT RANKING	ESTIMATED COST (IN MILLIONS)	SCHEDULE
Alternative 1					
Alternative 2					
Alternative 3—No Action					

11.3 Adverse Impacts that Cannot Be Avoided

11.4 Relationship Between Short Term Uses of the Environment and Maintenance and Enhancement of Long Term Productivity

11.5 Irreversible and Irretrievable Commitment of Resources

12 ENVIRONMENTAL MITIGATION AND MONITORING PLANS

12.1 Environmental Mitigation Plan

Activity	Identified Environmental Impacts	Are Impacts Potentially Significant?	Mitigation Measure(s)	Monitoring Indicator(s)
List all site activities or processes (e.g. asbestos roof removal, installation of toilets, remove and replace flooring) A line must be included for each activity or process that is identified.	Include a separate sub-line for each environmental impact associated with a single activity or process	Indicate (Y)es or (N)o If no, provide justification, such as: --does not exceed existing background conditions --does not exceed applicable legal limits --does not pose a risk because of low severity, frequency, or duration	Describe the mitigation measures that will offset the associated environmental impact. If mitigation measures are well-specified in the IEE, quote directly from IEE If they are not well-specified in the IEE, define more specifically here.	Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)

12.2 Environmental Monitoring Plan

Monitoring Indicator(s)	Monitoring and Reporting Frequency	Responsible Party(ies)	Records Generated
Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)	For example: "Monitor weekly, and report in quarterly reports. If XXX occurs, immediately inform USAID activity manager."	If appropriate, *separately* specify the parties responsible for mitigation, for monitoring and for reporting.	If appropriate, describe types of records generated by the mitigation, monitoring, and reporting process.

13 LIST OF PREPARERS

Include names and qualifications of preparers

14 APPENDICES

US Agency for International Development
1300 Pennsylvania Avenue, NW
Washington, DC 20523
Tel: (202) 712-0000
Fax: (202) 216-3524
www.usaid.gov

Attachment 4: Site Specific Environmental Compliance Plan and Record of Compliance Template

SITE-SPECIFIC ENVIRONMENTAL COMPLIANCE PLAN

for [Activity Name]

Implemented under: [Project Name]

DCN: 2011-MAC-017

Prepared by: [Implementer]

Date

SITE-SPECIFIC ENVIRONMENTAL COMPLIANCE PLAN

The purpose of the site-specific Environmental Compliance Plan (ECP) is to ensure that subaward activities are carried out in compliance with 22 CFR 216, USAID's implementing regulations that further the purposes of the National Environmental Policy Act (NEPA) for projects implemented abroad. The ECP shall be used in conjunction with an Environmental Report, associated with negative determinations with conditions environmental threshold decisions or Environmental Assessments, associated with positive determinations environmental threshold decisions. Environmental Reports and Environmental Assessments will result in the development of Environmental Mitigation and Monitoring Plans (EMMPs) for the primary project. Site-specific Environmental Compliance Plans adapt project level EMMPs to subaward activities and site-specific field implementation to ensure that environmental consequences of these activities are fully controlled.

A. PROJECT AND SITE DATA:

Project Name: *(as stated in the triggering IEE)*	
Country:	
DCN of Triggering IEE:	
DCN of Environmental Report (if applicable):	
Project Name:	
Type of Project:	
Site Name:	
Name of Reviewer and Summary of Professional Qualifications:	
Date of Review:	

B. SUBPROJECT DESCRIPTION:

1. Subproject Purpose
2. Subproject Need
3. Location
4. Beneficiaries (e.g. size of community, number of school children, etc)
5. Number of Employees and Annual Revenue (if this is a business)
6. Implementation Timeframe and Schedule
7. Detailed Description of Site (e.g. size of the facility/acreage; steps that will be taken to accomplish the activities at the site)
8. Site Map **(***Provide an image from Google Earth of the location***)**
9. Photos of Site

C. SITE-SPECIFIC BASELINE ENVIRONMENTAL CONDITIONS:

1. Population Characteristics
2. Geography
3. Natural Resources (e.g. nearby forest/protected areas, ground and surface water resources)
4. Current Land Use
5. Proximity to Public Facilities (e.g. schools, hospitals, etc.)
6. Current Environmental Conditions in the Area of the Site

D. LEGAL, REGULATORY AND PERMITTING REQUIREMENTS

1. Please describe the national environmental impact assessment requirements for this site
2. Please list the local permits that must be obtained for this site, process for obtaining them and the schedule for obtaining them:

Permit Type	**Schedule**
Zoning	
Building/Construction	
Source Material Extraction	
Waste Disposal	
Wastewater	
Air	
Water Use	
Historical or Cultural Preservation	
Wetlands or Water bodies	
Threatened or Endangered Spp.	
Other	

3. Please list additional host government environmental laws or environmental standards that the site must comply with?

    a. Air emission standards
    b. Water discharge standards
    c. Solid waste disposal or storage regulations
    d. Hazardous waste storage and disposal
    e. Historical or Cultural Preservation
    f. Other

4. Please describe U.S., EU, or other international standards that the Site must comply with.

E. ENGINEERING SAFETY AND INTEGRITY (Provide a discussion of any of the following issues that will or might occur as a result of this site activity—if the content does not apply to this site, please delete)

1. Have engineering designs and plans been developed by a qualified engineering?
2. Do designs and plans effectively and comprehensively address management of storm water runoff and its effects?
3. Do designs and plans effectively and comprehensively address reuse, recycling, and disposal of construction debris and by-products?

4. Do designs and plans incorporate pollution prevention measures, wherever appropriate?
5. Do designs and plans effectively and comprehensively address environmental management of mobilization and de-mobilization?
6. Are there known geological hazards such as faults, landslides and unstable soil structure that affect the site? If so, how will you ensure engineering integrity of any structures?
7. Will the site require grading, trenching, or excavation? Will the site activity generate borrow pits? If so, how will these be managed during implementation and closure?
8. Will the site activity cause interference with the current drainage system?
9. Will the site activity interfere with utility transmission such as above and below-ground cables; water, sewer and gas lines; etc.?
10. Is an emergency plan included in the engineering plans and designs?
11. Does the site activity increase the risk of fire, explosion, or hazardous chemical releases?
12. Does the site activity require disposal or retrofitting of PCB-containing equipment (e.g., transformers, florescent light ballasts, etc.)
13. Is the site activity associated with occupational safety and health hazards? If so, has a health and safety action plan been developed?

F. ENVIRONMENTAL CONSEQUENCES (Provide a discussion of any of the following issues that will or might occur as a result of this site activity—if the content does not apply to this site please delete)

1. Potential Impacts to Public Health and Well-being

a. Will the site activities require resettlement of any portion of the surrounding community?
b. Will area residents and/or workers be exposed to pesticides, fertilizer, or other toxic substances as a result of farming or manufacturing?

    - If so, how will you ensure that these chemicals do not penetrate into ground water or flow into surface water?
    - If so, how will you ensure that workers wear protection clothing to prevent exposure?
    - If so, what measures will be taken to control releases of these substances to air, water, and land?
    - If so, how will the site be restricted to remove the potential for human exposure?

c. Will the site activity generate wastes from pesticides, chemicals or industrial wastes that will contaminate ground and surface water supplies used for bathing and drinking water?
d. Will the site activity result in odor or noise from livestock facilities that may disturb local communities or contaminate surface or groundwater?
e. Will the site activity generate wastes including construction debris, dry or wet cell batteries, florescent tubes, aerosol cans, paint, solvents, etc.? If so, how will this waste be disposed of?
f. Do site activities require the removal of asbestos-containing building materials or include the use of building materials that may contain asbestos, formaldehyde, or other toxic materials? Can you certify that building materials are non-toxic? If so, how will these wastes be disposed of?
g. Does the site activity provide a new source of drinking water for a community? If so, how will you monitor the new drinking water source to ensure that it is free of contaminants that may harm human health?

h. Will construction or refurbishment activities associated with demolition or blasting result in increases in noise, air and light pollution due to increased traffic, construction operations and increase in light that will be disturbing to the surrounding community?
i. Does the site activity generate sewerage wastes? If so, how will this be controlled?
j. Will the site activity involve burning of wood or biomass for cooking? If so, please describe the ventilation system?

2. Land Use Changes and Impacts

k. Will the site activity convert fallow land to agricultural land?
l. Will the site activity convert forest land to agricultural land?
m. Will the site activity convert agricultural land to urbanized area?
n. Will chemical containers be stored at the site?
o. Will the site activity generate solid wastes that will be deposited to land resources?
p. Will the site activity generate solid or hazardous wastes such as construction debris, dry or wet cell batteries, florescent tubes, aerosol cans, paint, solvents, etc.?
q. Does the site activity generate medical wastes? If so, how will it be handled onsite and disposed of offsite?
r. Will the site activity require onsite storage of liquid fuels or hazardous materials in bulk quantities?
s. Will the site activity result in mineral extraction such as granite, limestone, coal, lignite, oil, gas?
t. Will the site activity alter the view shed of the area community or residents?

3. Water Use Changes and Impacts

a. How far is the site located to the nearest river, stream or lake?
b. What is the depth to groundwater at the site ?
c. Will the site activity result in an increase in groundwater extraction? If so, what is the volume?
d. Will the site activity result in an increase in surface water withdrawals? If so, what is the volume?
e. Does the site activity result in increased storm water run-off?
f. Will the site activity result in the runoff of pesticides, fertilizers or toxic chemicals into surface water?
g. Will the site activity result in fertilizer, pesticide and toxic chemical contamination of groundwater?
h. Will the site activity result in discharge of livestock wastes such as manure or blood into surface water?
i. Does the site require excavation, placing of fill, or substrate removal (e.g., gravel) from a river, stream or lake?
j. Is there potential for discharges of waste water or potentially contaminated (including suspended solids) storm water from the site?
k. Will the site activity disturb wetland, lacustrine, or riparian areas?

4. **Impacts to Forestry, Biodiversity, Protected Areas and Endangered Species**

    a. Is the site located in an endangered or threatened species habitat? Is there a plan for identifying endangered or threatened species during site activity implementation? If such species are identified during implementation, describe the process for notifying authorities?
    b. Is the site located in a migratory bird flight path?
    c. Is the site located adjacent to a protected area, national park or wildlife refuge?
    d. Will the site activity generate an increase in carbon emissions?
    e. Will the site activity involve decommissioning of systems that contain ozone depleting substances?
    f. Will the site activity alter the area's microclimate?
    g. Will the site activity involve harvesting of non-timber forest products such as mushrooms, medicinal and aromatic plants (MAPs), herbs, and/or woody debris?
    h. Will the site activity involve tree removal or logging? If so, please describe.

5. **Historic or Cultural Resources**

    a. Are there cultural or historic sites located at or near the site? If so, what is the distance from these? What is the plan for avoiding disturbance or notifying authorities?
    b. Are there unique ethnic or traditional cultures or values present in the site? If so, what is the preservation plan addressing these?

G. SITE CLOSURE AND HAND OVER

1. If this site activity involves construction or renovation, what phases are involved (mobilization, site preparation and staging; implementation; waste disposal; site restoration; closure; handover; etc.)?
2. Please briefly described the environmental impacts that must be addressed during each of the phases?
3. Will the host country recipient organization have the capacity to sustain the environmental management aspects of the site activity after closure and handover?

H. Site-specific Environmental Mitigation and Monitoring Plans

The Site-specific EMMP should track EMMPs developed as part of a full project-level Environmental Report or Environmental Assessment. Implementers should describe here how activities differ from the project-level EMMP and include only those activities related to the specific site, using the template provided below. If there are additional activities that are not included in the project-level report or assessment, then they need to be amended to include those. Please develop Site-specific EMMPs for each activity site. Include detailed information about when and how monitoring of mitigation measures will be performed throughout the life of the site activity, and who will do it.

1. **Site-specific Environmental Mitigation Plan**

Activity	Identified Environmental Impacts	Are Impacts Potentially Significant?	Mitigation Measure(s)	Monitoring Indicator(s)
List all site activities or processes (e.g. asbestos roof removal, installation of toilets, remove and replace flooring) A line must be included for each activity or process that is identified.	Include a separate sub-line for each environmental impact associated with a single activity or process	Indicate (Y)es or (N)o If no, provide justification, such as: --does not exceed existing background conditions --does not exceed applicable legal limits --does not pose a risk because of low severity, frequency, or duration	Describe the mitigation measures that will offset the associated environmental impact. If mitigation measures are well-specified in the IEE, quote directly from IEE If they are not well-specified in the IEE, define more specifically here.	Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)

2. **Site-specific Monitoring Plan**

Monitoring Indicator(s)	Monitoring and Reporting Frequency	Responsible Party(ies)	Records Generated
Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)	For example: "Monitor weekly, and report in quarterly reports. If XXX occurs, immediately inform USAID activity manager."	If appropriate, *separately* specify the parties responsible for mitigation, for monitoring and for reporting.	If appropriate, describe types of records generated by the mitigation, monitoring, and reporting process.

I. CERTIFICATION OF NO ADVERSE OR SIGNIFICANT EFFECTS ON THE ENVIRONMENT

The undersigned certifies that all foreseeable adverse or significant effects on the environment have been adequately and effectively eliminated or mitigated by this Site-Specific Environmental Compliance Plan. If new adverse effects or the need for new or improved mitigation measures are identified, I will immediately notify the USAID activity manager/COTR/AOTR.

_____ _____

Implementer Project Director/COP: Date

J. APPROVAL:

_____ USAID/Project COTR/AOTR:	_____ Date
_____ Mission Environmental Officer	_____ Date

Copy Provided to (Check Box):

☐ Bureau Environmental Officer

US Agency for International Development
1300 Pennsylvania Avenue, NW
Washington, DC 20523
Tel: (202) 712-0000
Fax: (202) 216-3524
www.usaid.gov

[EXAMPLE TEMPLATE]

RECORD OF COMPLIANCE WITH SITE-SPECIFIC ENVIRONMENTAL MITIGATION AND MONITORING PLANS

SUBJECT:	Site Name/Primary Project Name/IEE DCN Number
TO:	COTR/AOTR
COPY:	Mission Environmental Office
DATE:	

The [name of the implementing organization] has finalized its activities at the [site name] to [describe activities that were undertaken]. This memorandum is to certify that our organization has met all conditions of the Site-specific Environmental Compliance Plan for this site activity. A summary of the how mitigation and monitoring requirements were met is provided below.

1. Mobilization and Site Preparation
2. Site Activity Implementation Phase
3. Site Closure Phase
4. Site Activity Handover

Sincerely,

_____
Chief of Party
Implementing Partner Organization

Approved:

_____ _____
AOTR/COTR Date

_____ _____
Mission Environmental Officer Date

Copy Provided to (Check Box):

☐ Bureau Environmental Officer