

**INITIAL ENVIRONMENTAL EXAMINATION  
OR  
CATEGORICAL EXCLUSION**

**PROGRAM/ACTIVITY DATA:**

**Program/Activity Number:** 696-

**Country/Region:** Rwanda/East Africa

**Program/Activity Title:** Community Health and Improved Nutrition (CHAIN) Project

<b>Foreign Assistance Objective:</b>	<b>Investing in People</b>
<b>Program Area 3.1:</b>	<b>Health</b>
Program Element: 3.1.1:	HIV/AIDS
Program Element: 3.1.3:	Malaria
Program Element: 3.1.6:	Maternal Health and Child Health
Program Element: 3.1.7:	Family Planning and Reproductive Health
Program Element: 3.1.8:	Water Supply and Sanitation
Program Element 3.1.9:	Nutrition

<b>Foreign Assistance Objective 4:</b>	<b>Economic Growth</b>
Program Area 4.5:	Agriculture
Program Element: 4.5.2:	Agriculture Sector Capacity

**IEE Prepared By:** Judy Chang, Health Service Delivery Team Leader  
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**Period Covered:** FY2014 - FY2018

**LOP Amount:** \$117 million  
**Current Date:** October 1, 2014  
**Expiration Date:** September 30, 2018

**IEE Amendment (Y/N):** No. In conjunction with the forthcoming Strengthening Capacity of Health Sector to Deliver Quality Health Services in Rwanda (SCHS) Project IEE, it also updates and replaces the "Rwanda Health\_IEE\_081910."

**ENVIRONMENTAL ACTION RECOMMENDED:** (Place X where applicable)

Categorical Exclusion:   X   Negative Determination:   X    
Positive Determination:        Deferral:   X  

**ADDITIONAL ELEMENTS:** (Place X where applicable)

EMMP:   X   CONDITIONS   X   PVO/NGO:   X

## **SUMMARY OF FINDINGS:**

### **Scope**

The purpose of this IEE, in accordance with 22CFR216, is to provide the first review of the reasonably foreseeable effects on the environment, and recommended Threshold Decisions, for activities authorized under the USAID Community Health and Improved Nutrition (CHAIN) Project. This IEE evaluates all current and planned activities in the CHAIN PAD. In conjunction with the forthcoming Strengthening Capacity of Health Sector to Deliver Quality Health Services in Rwanda (SCHS) Project IEE, it also updates and replaces the “Rwanda Health\_IEE\_081910.”

Activities authorized by this IEE are listed in Table 1 below. Any modification of activities or amendment to the PAD to include a new activity will require an amendment of this IEE before approval of the PAD amendment.

Ongoing activities operating with an approved environmental mitigation and monitoring plan (EMMP) conforming to the requirements of the IEE “Rwanda Health\_IEE\_081910” may continue operating under that approved EMMP. **Ongoing activities without an approved environmental mitigation and monitoring plan (EMMP) are required to prepare and have approved an EMMP based on this IEE in a timely manner.**

For purposes of analysis, this IEE synthesizes current and anticipated activities under the CHAIN PAD. As with all IEEs, and in accordance with 22 CFR 216, it reviews the reasonably foreseeable effects of each activity on the environment. On this basis, this IEE recommends Threshold Decisions, and in some cases, conditions for these activities.

In addition, this IEE sets out activity-level implementation procedures intended to assure that conditions in this IEE are translated into project-specific mitigation measures, and to assure systematic compliance with this IEE during project and activity implementation. **These procedures are themselves a general condition of approval for the IEE, and their implementation is therefore mandatory.**

### **Recommended Determinations:**

This IEE recommends the following determinations:

#### **Categorical Exclusion:**

A Categorical Exclusion is recommended per:

- 22 CFR 216.2 (c)(2)(i), for all activities consisting of education, technical assistance or training programs, except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);
- 216.2 (c)(2)(iii) for analyses, studies, academic or research workshops and meetings;
- 216.2 (c)(2)(v) for document and information transfers;
- 216.2(c)(2)(viii) for programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, and treatment of water in the households);
- 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, etc.)

### Negative determination with conditions

A Negative Determination with conditions per 216.3(a)(2)(iii) is recommended for:

- procurement, storage, management, and disposal of public health commodities, including treated nets,
- production and processing of agricultural commodities for increased yields; enhanced nutritional value through the production of bio-fortified crops; and increased competitiveness through value added product transformation, such as fortification, to improve nutritional value,
- livelihood development activities that include small and medium enterprise development, including financing of these activities,
- financial products for saving and lending including agricultural credit and small and medium enterprises,
- small scale water and sanitation activities, and
- provision of small grants to community based organization.

### A deferral of a threshold determination, per 22 CFR 216.3(a)(7)(iii)

The following table (Table 1) summarizes the recommended determinations for activities authorized by the CHAIN PAD and covered by this IEE. For each, analysis of potential environmental impacts, activity-by-activity determinations, and conditions are provided within Section 4 of the IEE. Any modification of activities or amendment to the PAD to include a new activity will require an amendment of this IEE before approval of the PAD amendment.

**Table 1:** Activities authorized under the CHAIN PAD covered by this IEE

Activity	Categorical Exclusion(s)	Negative Determinations	Positive Determinations	Deferral
<b>Existing activity</b>				
African Evangelistic Enterprise – <i>Ubaka Ejo</i>	✓	✓ (w/conditions)		
Francois Xavier Bagnoud Rwanda - <i>Turengere Abana</i>	✓	✓ (w/conditions)		
Caritas Rwanda - <i>Gimbuka</i>	✓	✓ (w/conditions)		
Society for Family Health • Rwanda Social Marketing Program	✓	✓ (w/conditions)		
Global Communities - <i>Higa Ubeho</i>	✓	✓ (w/conditions)		
FHI360 • Roads to a Healthy Future (ROADS) III	✓	✓ (w/conditions)		
Multi-sectoral District Plan – Community-based Nutrition - UNICEF	✓			
<b>Planned activities</b>				
Nutrition-Specific Activity with Community-based WASH Messaging	✓			
Rwanda Increased Protein for Dietary Diversity (RIPDD)				✓
Water and Sanitation Infrastructure and Capacity Building Activity	✓	✓ (w/conditions)		
Improved Services for Vulnerable Populations	✓	✓ (w/conditions)		
Global Alliance for Improved Nutrition	✓	✓ (w/conditions)		

Activity	Categorical Exclusion(s)	Negative Determinations	Positive Determinations	Deferral
Mobile Messages for the 1000 Days	✓			
Prevention for Key Populations	✓	✓ (w/conditions)		
Social Marketing	✓	✓ (w/conditions)		
OVC Activities (CSOs)	✓	✓ (w/conditions)		

### General Implementation & Monitoring Conditions

The conditions associated with this threshold decision are detailed in Section 4 of this document and it is the responsibility of the Contracting/Agreement Officer's Representative (C/AOR), working in conjunction with the implementing partners, to ensure their implementation.

In addition, there are certain requirements that apply to all activities falling under the threshold determination of "Negative Determination with Conditions" These include:

1. The responsibility for implementing activities in accordance with the findings and conditions of this IEE must be incorporated into all contracts and cooperative agreements that serve to implement activities covered under this IEE.
2. USAID/Rwanda's implementing partners will complete an annual environmental mitigation and monitoring report (EMMR) of all activities, using the guidance and forms in Section 5.
3. USAID/Rwanda's C/AORs will undertake field visits and consultations with implementing partners to jointly assess the environmental impacts of ongoing activities, and the effectiveness of associated mitigation and monitoring plans.
4. Organizations receiving USAID/Rwanda funds and transferring them through grants or other mechanisms to other organizations must incorporate provisions stipulating:
  - a) the completion of annual EMMRs, and b) that activities to be undertaken will be within the scope of the environmental determinations and recommendations of this IEE.
5. USAID/Rwanda will ensure that implementing organizations have sufficient capacity to complete the environmental screening process and to implement monitoring and mitigation measures.
6. Adherence to applicable GOR environmental laws and policies.

### General Restrictions

This IEE does not authorize support for laboratory- or field-based research involving genetically-modified organisms (GMOs) or life-modified organisms (LMOs). Any support for laboratory- or field-based research, multiplication, or dissemination of GMOs or LMOs shall be subject to review under the Agency's Biosafety procedures.

This examination does not cover pesticides, including their procurement, use, transport, storage or disposal. Any pesticide activity considered under this program would necessitate an amendment of this IEE and the preparation of a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP), in accordance with AFR Bureau guidance and fulfilling all analytical elements required by 22CFR216.3(b), USAID's Pesticide Procedures.

This examination does not cover fertilizers, including their procurement, use, transport, storage or disposal. Any activity including procurement, use, transport, storage or disposal of fertilizers would necessitate the amendment of this IEE.

**APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:**  
IEE for USAID/Rwanda Community Health and Improved Nutrition Project

**CLEARANCE:**

Acting Mission Director: \_\_\_\_\_ Date: \_\_\_\_\_  
Marcia Musisi- Nkambwe

**CONCURRENCE:**

AFR Bureau Environmental Officer: \_\_\_\_\_ Date: \_\_\_\_\_  
Brian Hirsch

Approved:  Disapproved:

FILE N°: Rwanda\_CHAIN\_IEE\_2014\_2018.docx

**ADDITIONAL CLEARANCES:**

Health Office Director: \_\_\_\_\_ Date: \_\_\_\_\_  
Robert Cunnane

Economic Growth Office Director: \_\_\_\_\_ Date: \_\_\_\_\_  
Joseph Lessard

Mission Environmental Officer: \_\_\_\_\_ Date: \_\_\_\_\_  
Aimee Mpambara

Regional Environmental Advisor: \_\_\_\_\_ Date: \_\_\_\_\_  
USAID/East Africa David Kinyua

**Distribution List:**

- USAID/Rwanda Health Office
- USAID/Rwanda Economic Growth Office
- USAID/Rwanda Office of Acquisitions and Assistance
- USAID/Rwanda Program Office
- MEO, REA, BEO

**APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:**  
IEE for USAID/Rwanda Community Health and Improved Nutrition Project

**CLEARANCE:**

Acting Mission Director:

Marcia Musisi Nkambwe  
Marcia Musisi- Nkambwe

Date: 12/1/14

**CONCURRENCE:**

AFR Bureau Environmental Officer:

Brian Hirsch  
Brian Hirsch

Date: 12/18/14

Approved:  Disapproved:

FILE N°: Rwanda\_CHAIN\_IEE\_2014\_2018.docx

**ADDITIONAL CLEARANCES:**

Health Office Director:

Robert Cunnane  
Robert Cunnane

Date: 12/10/14

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Mission Environmental Officer:

Aimee Mpambara  
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Date: 12/10/14

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David Kinyua  
David Kinyua

Date: 12/10/14

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### PROGRAM/ACTIVITY DATA:

Program/Activity Number: 696-

Country/Region: Rwanda/ East Africa

Program/Activity Title: Community Health and Improved Nutrition (CHAIN) Project

## 1.0 BACKGROUND AND PROJECT DESCRIPTION

### 1.1 Purpose and Scope of the IEE

The purpose of this IEE, in accordance with 22CFR216, is to provide the first review of the reasonably foreseeable effects on the environment, and recommended Threshold Decisions, for activities authorized and funded under the USAID Community Health and Improved Nutrition (CHAIN) Project. This IEE synthesizes current and anticipated community health and nutrition activities into a set of intervention categories, each of which contains a number of entailed activities.

This IEE also sets out activity-level implementation procedures intended to ensure that the conditions in the IEE are translated into activity-specific mitigation measures, and to ensure systematic compliance with this IEE during activity implementation. This IEE evaluates all current and planned activities in the CHAIN PAD. In conjunction with the forthcoming Strengthening Capacity of Health Sector to Deliver Quality Health Services in Rwanda (SCHS) Project IEE, it also updates and replaces the “Rwanda Health\_IEE\_081910.”

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This IEE is a critical element of a mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation.

### 1.2 Background

CHAIN will consist of a number of mechanisms and activities intended to increase utilization of quality health services and products by target populations and communities. CHAIN will include health promotion, social marketing and HIV prevention interventions; the strengthening of social services to

vulnerable populations, especially orphans and vulnerable children (OVC) and people living with HIV (PLHIV); and interventions addressing the severe nutrition challenges—including water, sanitation, and hygiene (WASH)—confronting Rwanda at this time. In addition to strengthening the capacity of individuals, households and community structures to improve health and nutritional status, the project will support activities strengthening the Government of Rwanda’s (GOR) capacity where appropriate, and emphasize strengthening the capacity of civil society organizations (CSOs).

The CHAIN project will link to and take advantage of the mechanisms and activities supported across three Development Objectives (DO) in the Mission Country Development Cooperation Strategy (CDCS). It supports:

- DO1, Economic opportunities increased and particularly, Intermediate Results (IR) 1.1, Increased productivity and nutrition outcomes of agriculture;
- DO2, Improved conditions for durable peace and development through strengthened democratic processes and particularly Sub-IR 2.1.1, Improved performance and engagement by CSOs and GOR entities; and
- DO3, Health and well-being of Rwandan improved, particularly IR 3.2, Increased utilization of quality health services/products by target populations and communities.

CHAIN also directly supports USG initiatives and priorities such as the Global Health Initiative, PEPFAR Blueprint: Creating an AIDS-Free Generation, USG Action Plan on Children in Adversity, Ending Preventable Child and Maternal Deaths, and Feed the Future Initiative to reduce poverty and under-nutrition. It also supports the GOR’s National Food and Nutrition Strategic Plan (2013-2018), and the Third Health Sector Strategic Plan (2012-2018).

### 1.3 Project Description

The purpose of the CHAIN project is to increase the utilization of quality health services/products by target populations and communities. It will strengthen the capacity of target populations and communities to improve their health and nutritional status. By the end of the project, significant progress will have been made towards eliminating health inequalities through both direct services and structural reform. Households and individuals will have improved access to health products and services, adopted health seeking behaviors, and improved their health status as a result. These results will be especially apparent among the most vulnerable individuals including pregnant and lactating women, young children, OVC, and key populations, contributing to reduced health inequalities. It is expected that local CSOs will have improved links with local government programs providing health and social services, and there will also be increased capacity and engagement of the private sector in delivering specific health and nutritional products. Mechanisms that link and coordinate Rwandan CSO efforts with those of GOR health system and social services, such as community health workers, one-stop centers for gender-based violence, Vision 2020 Umurenge Program, and community health insurance, will be forged and strengthened.

The activities authorized by the CHAIN PAD and covered by this IEE are described in Table 2 below. It should be noted that there are additional activities included in, but not authorized under, the CHAIN PAD. These activities are covered under the IEE(s) associated with their respective PADs.

**Table 2. Activities authorized by the CHAIN PAD**

Activity	Description
African Evangelistic Enterprise • Ubaka Ejo	<i>Ubaka Ejo</i> supports OVC, their families, and other vulnerable households to improve their health and social and economic well-being. <i>Ubaka Ejo</i> plays a key role in identifying and reaching vulnerable populations, providing services, and strengthening referral systems. Over the first three years, the program will serve 18,100 OVC and



Activity	Description
	their families in 9 districts across 4 provinces through a community-led program of sustainable prevention, care, and support; coverage of activities will be expanded as part of a planned two-year cost extension.
Francois Xavier Bagnoud Rwanda • Turengere Abana	<i>Turengere Abana</i> is working to improve the social and economic wellbeing of 85,000 adults and children, including OVC and their families, affected by HIV/AIDS in 8 districts of Rwanda. Key activities include: livelihood grants and training; nutrition support; health behavior change training; access to health insurance, education support, child protection services and psychosocial counseling; safe water and hygiene; intensive case management; and mentorship and technical assistance. The program also seeks to strengthen household resilience through health, economic and social service provision, nutrition and education support, child protection, and GBV prevention services.
Caritas Rwanda • Gimbuka	<i>Gimbuka</i> aims to 1) improve the nutritional status of mothers and children, especially those under two years of age, through community-based nutrition interventions, and 2) improve the well-being of OVC and their families affected by HIV/AIDS. It is implemented by a Rwandan CSO named Caritas. The organization covers 14 districts for OVC interventions and 9 districts for nutrition activities serving a total population of 36,070 OVCs, including their families; 43,200 children under five years; and pregnant and lactating women for nutrition. <i>Gimbuka</i> uses cost-effective, community-based solutions like internal savings and loan groups (ISLG), Growth Monitoring and Promotion (GMP), Farmer Field Schools, and the Positive Deviance Hearth (PD Hearth) model. Target populations will expand as part of a planned two-year cost extension.
Society for Family Health • Rwanda Social Marketing Program	The Rwanda Social Marketing Program targets key populations and focuses on creating demand and improving access to health products related HIV prevention; malaria; water, sanitation and hygiene (WASH); nutrition; family planning and reproductive health; and maternal and child health. It is implemented by the Society for Family Health (SFH), a Rwandan CSO. Specific objectives of the activity include: 1) developing and managing a cost-effective marketing, sales, and distribution network that improves access among key populations to branded health products; 2) enhancing services and referrals for key populations; and 3) increasing availability of data and evidence to inform programming around key issues in HIV/AIDS, malaria, family planning and reproductive health, and maternal and child health.
Global Communities • Higa Ubeho	<i>Higa Ubeho</i> improves the stability and resilience of up to 72,000 HIV-affected and other vulnerable Rwandan households in 20 districts. Strategic objectives include: increasing vulnerable household access to quality health and social services; improving household resilience through economic, nutritional and educational investments; and strengthening civil society capacity for health and social service provision. Rwandan civil society partners are working with the implementing partner to ensure that household revenues are leveraged towards more household responsibility for school fees, school material, and health insurance payments.
FHI360 • Roads to a Healthy Future (ROADS) III	The ROADS III program reduces risks for HIV transmission and mitigates its impact among key populations along the transport corridors and in cross-border communities of Rwanda. The program focuses on high visibility Safe-T-Stop centers where transient populations access services; income generating activities like LifeWorks© dedicated to reducing socioeconomic vulnerabilities; organizational strengthening and capacity development of cooperatives; outreach VCT; care and support to OVC and PLHIV; community-based Positive Prevention through PLHIV associations to reduce risky behaviors, promote condoms, treat and manage STIs, and access counseling and support for VCT, family planning and reproductive health; and full integration of family planning, MCH, child survival messages, community based nutrition, and linkages to health services.
UNICEF – Multi-Sectoral District Plan – Community Based	UNICEF/Rwanda supports the Government of Rwanda’s efforts by enabling districts and their institutions to deliver nutrition-sensitive services; create awareness of the need to focus on available, affordable, and cost-effective solutions to improve nutrition

Activity	Description
Nutrition	especially during “the 1000 days window” of opportunity as well as build the capacity of service providers in maternal and young child nutrition. UNICEF/Rwanda supports the operationalization of the “District Multi-Sectoral Plans for the Elimination of Malnutrition;” provides technical and financial support to the MOH to scale up home fortification; and provides financial support to the MOH to print job aids for nutrition rehabilitation for health facilities across the country.
Planned New Activity: Nutrition-Specific Activity with Community-based WASH Messaging	This activity will focus on traditional nutrition-specific interventions (e.g., improving exclusive breastfeeding, complementary feeding among children 6 to 24 months, and micronutrient supplementation for pregnant and lactating women) and social and behavior change nutrition and WASH messaging. It will strengthen the capacity of CHWs to deliver key nutrition and WASH messages, improve child growth monitoring and promotion, and conduct cost of diet studies to improve complementary feeding practices. Additionally, it will explore micronutrient fortification opportunities and conditional cash transfers related to nutrition messaging.
Planned New Activity: Rwanda Increased Protein for Dietary Diversity (RIPDD)	This activity will promote the production, processing, distribution, and commercialization of animal source foods to increase the availability and consumption of protein. Partnerships with the private sector will be forged to improve the poultry value chain. Advocacy on the importance of consuming animal protein will be aimed at all levels from consumers to governmental institutions that enact agriculture policies.
Planned New Activity: Water and Sanitation Infrastructure and Capacity Building	This activity will improve water and sanitation infrastructure and local capacity in selected districts. It will work with district governments in developing district water and sanitation plans that explicitly consider gender and equity, and support expanding access to drinking water supply under public-private partnerships, while building technical and managerial capacity on both the district government and the private operator sides for this model of water service delivery. It will work with both existing and new sanitation supply chain actors and entrepreneurs. There will be a focus on private sector partnerships.
Planned New Activity: Improved Services for Vulnerable Populations (ISVP)	ISVP will aim to 1) increase the capacity of families and communities to provide healthy, nurturing, and engaging environments for vulnerable children under 5; 2) decrease family economic vulnerability; 3) increase knowledge, attitudes, skills, aspirations, and confidence of adolescents transitioning to adulthood; and 4) increase the capacity of communities to provide essential preventive and protective services to vulnerable families and children.
Planned New Activity: Global Alliance for Improved Nutrition	The activity will establish a “Marketplace for Nutritious Foods” that helps local entrepreneurs bring their nutrition-enhancing innovations from along the agricultural value chain to market. It will provide a space for innovative business ideas to be tested and adapted and offer a platform where market failures and policy constraints to improve nutrition can be analyzed and addressed. The goal is to increase the number of local private enterprises engaged in the production of nutritious foods, resulting in an increase in availability, quality, diversity and accessibility of nutritious foods in developing markets.
Planned New Activity: Mobile Messages for the 1000 Days	This planned PIO grant will leverage existing mobile platforms as a method of delivering key health messages to women of reproductive age and other targeted populations. Messages will be focused on the 1000 days and cover topics such as reproductive health, pregnancy, nutrition, and/or early childhood development.
Planned New Activity: Prevention for Key Populations	This follow-on to ROADS III will include activities similar to the current activity.
Planned New Activity: Social Marketing	This follow-on to the Rwanda Social Marketing Program will include activities similar to the current activity.
Planned New Activity: OVC Activities (CSOs)	These follow-on activities to Gimbuka, Ubaka Ejo, Turengere Abana will include activities similar to the current activities.

## 2.0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

The Rwandan relief is hilly and mountainous with an altitude averaging 1700 meters. The highest point on Mt Karisimbi is 4507 meters above sea level. Rwanda has volcanic mountains at the northern fringe and undulating hills in most of the central plateau. However, the eastern part of the country is relatively flat with altitudes well below 1500 meters. This relief pattern gives Rwanda a mild and cool climate that is predominantly influenced by altitude. Average annual temperatures are about 18.5°C and average rainfall is about 1250mm per annum. The lowlands of the southwest in Bugarama plain with an altitude of 900m are part of the tectonic depression of the African Rift Valley.

A recent mapping inventory of forests with a surface of 0.5 hectares or higher and with coverage of more than 20% indicated that Rwanda had an estimated 240,746 ha of forests in 2007. This is approximately 10% of the surface of the national dry lands [23, 835 sq.km]. Rwanda forests and woodlands fall into four categories: the natural forests of the Congo Nile Ridge comprised of Nyungwe National Park (NNP) Gishwati, and Mukura; the natural forests of Volcanoes National Park (VNP); the natural forests in savannah and gallery-forest of Akagera National Park (ANP) and remnants of gallery forests and savannahs of Bugesera, Gisaka and Umutara; and forest plantations dominated by exotic species (*Eucalyptus spp*, *Pinus spp*, *Grevillea robusta*, etc.) and trees scattered on farmlands (agroforestry) and along anti-erosion ditches.

Rwanda has four types of protected areas which include national parks (Akagera National Park, Nyungwe National Park and Volcanoes National Park); forest reserves (Gishwati forest, Iwawa Island forest and Mukura forest); forests of cultural importance (Buhanga forest); and wetlands of global importance (Rugezi- Bulera-Ruhondo wetland complex). Besides those forests with a legal status of protected areas, there are other forests of cultural importance (Busaga forest in Muhanga district) and other remnants natural forests which are more or less protected by law. In fact, the current law on forests prohibits human activities in natural forests.

Rwanda's hydrological network includes numerous lakes and rivers and their associated wetlands. A recent inventory of marshlands in Rwanda conducted in 2008 identified 860 marshlands, covering a total surface of 278,536 ha, which corresponds to 10.6 per cent of the country surface, 101 lakes covering 149,487 ha, and 861 rivers totalling 6462 km in length.

The major lakes include Kivu, Bulera, Ruhondo, Muhazi, Cyohoha, Sake, Kilimbi, Mirayi, Rumira, Kidogo, Mugesera, Nasho, Mpanga, Ihema, Mihindi, Rwampanga and Bisoke. The major rivers include the Akagera, Akanyaru, Base, Kagitumba, Mukungwa, Muvumba, Nyabarongo, and Ruvubu in the Nile Basin and Koko, Rubyiro, Ruhwa, Rusizi, Sebeya in the Congo Basin.

The most recent inventory of wetlands was conducted in 2008 by the Rwanda Environment Management Authority (REMA) through Integrated Management of Critical Ecosystems (IMCE) project funded by GEF and World Bank. This inventory showed that Rwanda has 860 marshlands and 101 lakes covering a total surface of 278,536 ha (10.6 per cent of the country surface area), and 149,487 ha, respectively. This inventory also found 861 rivers totalling 6,462 km in length. 41 per cent of the inventoried marshlands are covered by natural vegetation, 53 per cent are under cropping (which represents about 148 344 ha), and about 6 per cent are fallow fields. The biggest marshlands are associated with and clustered around the rivers. Rugezi and Kamiranzovu are high altitude wetlands while most of the others are low altitude.

### **Rwanda Environmental Regulation**

The Rwandan constitution addresses certain environmental dimensions, including environmental impact. Article 48 states: *'Any citizen has a right to a safe environment, satisfying and sustainable. Any person*

*has the duty of protecting, maintaining and promoting the environment. Any act aiming at damaging the environment is punished by the law. The state must protect the environment.'*

Later, article 192 forbids any accords authorizing the storing on Rwandan territory of toxic waste and other substances, which may dangerously damage the environment. It states: *'Accords on installation of military barracks on the national territory and those authorizing the storage of toxic waste and other substance which are dangerous for the environment are prohibited.'*

The Environmental Threats and Opportunities Assessment (ETOA) conducted in 2008 found that since 2004, Rwanda has made significant progress to establish a stronger foundation for its environmental activities. Some of the important changes that have impacts on the environment include:

- Passage of the Organic Law No. 04/2005;
- Establishment of the Rwanda Environmental Management Authority (REMA) under Law No. 08/2006;
- Implementation of a government Decentralization Policy and legislation;
- Development and implementation of a land reform process; and
- Provision to the public and private sectors of tools that require the environment to be an integral part of the solutions to critical economic issues with the implementation of the Economic Development and Poverty Reduction Strategy (EDPRS) following the recommendations of Vision 2020.

The Organic Law on environment is the most significant baseline conservation legislation since 2004. This law serves to: conserve the environment, people, and their habitats; set up fundamental principles related to protection of environment; discourage any activities that may degrade the environment; promote the social welfare of the population while considering equal distribution of the existing wealth; consider the durability of resources with a special emphasis on equal rights to present and future generations; guarantee to all Rwandans sustainable development which does not harm the environment and the social welfare of the population; and establish strategies of protecting and reducing negative effects on the environment and improving/restoring the degraded environment.

### **Threats to the environment**

Despite the important gains that have been made in protecting the environment over the past five years, significant threats to their existence and well-being remain prominent. The most significant threats to the environment include: population pressure; institutional weaknesses and inefficiencies; energy pressure; degradation of wetlands and lack of clean water; agricultural inefficiencies and soil erosion; and waste disposal issues.

### **Population pressure**

Rwanda's population growth over the last 4 decades has been unprecedented – from approximately 2.6 million in 1960 to 8.2 million in 2002 (National Census Service, 2005). The present population is approximately 10.8 million. The annual population growth rate was 3.1% in 2002, one of the highest in Sub-Saharan Africa, but declined to about 2.6% in 2007. Population density is about 343 people per km<sup>2</sup>, the highest in Africa, but in some districts such as Musanze in the north and Huye in the South, it exceeds 500 people/km<sup>2</sup>. Almost 60 percent of the population lives below the poverty line and cannot meet their basic human needs. These facts mean enormous pressure on the environment and make protecting, let alone conserving, the remaining forest and biological resources a formidable task. Soils for cultivating, trees for fuel and shelter, biodiversity habitats for the genetic fabric of life, and water for everything are under constant pressure for their use from just about everywhere.

### **Institutional weaknesses and inefficiencies**

It was noted above that the legal and policy framework for conservation and environmental protection has improved significantly during the past five years. There are still enormous gaps, inefficiencies, and lack of practical implementation experience. Without these important resource governance tools, ecosystems remain very vulnerable to the ongoing misuse of their products and services.

The institutions that are working to protect the environment and deal with the threat issues typical of a growing economy are young, and for the most part, the people working in them are inexperienced. They often come up short in terms of the professional training that is required and the knowledge that experience usually brings. There is also lack of coordination and communication as many of those charged with protecting the environment are trying to cope with an overload of responsibilities that result from understaffing and a lack of knowledge about effective management in general.

### **Energy pressure**

The majority of Rwandans use wood for their energy needs. Factoring in the population growth rate, this means more trees are needed from less land area required to grow them. And because there is no comprehensive strategy to address the problem, the government has been taking an unsustainable “band-aid” approach. Even though Rwanda has traditionally used a viable agroforestry approach in its farming systems, wood for fuel is continuing to come up short. If this threat is to be mitigated, more needs to be done in terms of managing and conserving remaining tree stocks outside of protected areas, tree planting, strategies for harvesting and transport, and for more effective stoves for burning the fuel.

### **Degradation of wetlands and lack of clean water remain significant issues**

A comprehensive water and wetlands policy would do much to alleviate these problems and enable the ecosystem services dependent on soils and water to function better. A particularly significant threat is stream channelization to drain wetlands for agriculture. This causes “down-cutting” of the streambeds and significant increases in erosion and sedimentation. Today, all downstream users are susceptible to more marginal water quality and greater risk from water-borne pollutants that originate from urban areas and agricultural lands. There is a government effort to curb erosion by creating bench terraces throughout the country’s thousands of steep hills, but it is subject to controversy due to its radical nature. Other aspects of the debate include the bench terraces’ high cost, their environmental effectiveness, and with the continuous maintenance, their sustainability.

### **Agricultural inefficiencies**

Historically, Rwanda has traditionally had productive farming systems coupled with complementary agroforestry techniques. Negative impacts today stem from the extreme pressure on the soils, literally wearing them out, due to the very high level of people trying to eke an existence from smaller and smaller plots of land. Education and awareness is needed today on farming systems that avoid use of chemical fertilizers and pesticides, help maintain and support crop diversification efforts, promote rational soil conservation techniques such as progressive terracing, use integrated pest management, and encourage cooperative food security planning among local and district governments and farmers.

### **Waste disposal issues**

Medical and industrial wastes also pose a threat not only to the environment but also the physical health of Rwandans. Small changes in temperature and rainfall could be devastating to flora and habitats that are important to wildlife. An erosion of any genetic diversity, or further destruction of the environment, will affect not only Rwandans, but also all those downstream from Rwanda -- just about all of central and northeastern Africa that are part of the Congo and Nile Basins. Rwanda’s protected areas are not only critical in terms of their flora and fauna diversity, they are also fragile and most likely vulnerable to small changes in climate. The GOR is working to address these risks and has started to develop strategies that might help them cope when change comes.

### **3.0 EVALUATION OF PROJECT ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL**

Many of the activities under the CHAIN Project do not have direct adverse environmental impacts, as they entail information, education, communication, training, research, community mobilization, planning, management, and outreach activities. There are some activities, however, that give rise to environmental concern: 1) procurement, storage, management, and disposal of public health commodities, 2) home garden and other agricultural production activities, 3) economic growth activities that include small and medium enterprise development, including financing of these activities, 4) water and sanitation activities. The following list of potential impacts is indicative rather than exhaustive. These potential impacts are referenced at several points in the analyses of the various activities.

#### **3.1 Procurement, Storage, Management and Disposal of Public Health Commodities**

Procurement, storage, management, and disposal of public health commodities including pharmaceutical drugs, personal protective gear to prevent communicable disease, family planning products including condoms, and medical supplies and basic medical equipment have the potential to affect the environment in ways that are different from conventional pollutants. Pharmaceutical drugs are chemicals used for diagnosis, treatment (cure/mitigation), alteration, or prevention of disease, health condition, or structure/function of the human body. Pharmaceuticals have specific storage time and temperature requirements, and may expire or lose efficacy before they are used, particularly in remote areas where demand is low and/or infrequent. Pharmaceutical waste may also accumulate due to inadequacies in stock management and distribution, and the lack of a routine system of disposal. Their main pathway into the environment is through household use and excretion, and through the disposal of unused or expired pharmaceuticals.

The treatment of bed nets and curtains with insecticides has been shown to be a cost effective and efficacious approach to malaria vector control in many situations, and as such provides significant public health benefits. Along with these benefits, however, the use of these treated materials and their re-treatment with insecticides creates tangible risks to human health and the environment throughout the life cycle of the insecticide products. Health and environmental risks from the use of insecticide treated materials (ITMs) include potential exposure of humans and the environment during production, distribution, storage, use, and disposal of re-treatment pesticides, and a certain amount of exposure of persons using ITMs to pesticide vapors released from the materials. World Health Organization (WHO)-recommended ITM pesticide products are classified by the U.S. Environmental Protection Agency as only “moderately” toxic to humans, and with adequate safety precautions, the risk of adverse effects from their use is slight. In any event, severe poisonings have been reported with exposure to highly concentrated solutions. ITMs tend to be highly toxic to aquatic organisms, and precautions are necessary to ensure that they do not contaminate lakes, streams and other bodies of water supporting aquatic life.

Another environmental concern with bed nets is their inappropriate use as fishing gear. Generally, the geographic areas where bed nets are likely to be employed also contain water bodies such as lakes, rivers and streams; *i.e.*, areas where mosquitoes are likely to be found. Of course, such water bodies support fish stocks and other aquatic life that are key components of biodiversity and may be critical to rural livelihoods in such locales. Used bed nets could pose threats to the sustainability of fisheries because their small mesh size makes them rather ‘non-selective’ devices when used to harvest fish. They could negatively impact the abundance and distribution of juvenile fish, small fish species and the aquatic insects upon which fisheries and aquatic biodiversity depend.

#### **3.2 Home Garden and other Small-scale Agricultural Production Activities**

Small-scale gardening/farming activities present potential environmental impacts and will depend on the local circumstances. As the activities proposed under this project are small-scale and will take place on already cleared land, environmental impacts will be minimal but may include:

- Ecological and Human Health-Surface water nitrification/eutrophication due to excrement flowing into streams, ponds, and other water sources which can affect the health of aquatic species and drinking water quality.
- Human health exposure to parasites in animal excrement.
- Human health exposure to viruses such as H5N1 and others.

### **3.3 Small and Medium Enterprise (SME) Development**

While SMEs usually have a positive economic development impact, they often pose a direct threat to the environment if not properly managed. They may impose heavy social and economic burdens on their communities - degrading the ecosystem and food sources, undermining the health of neighbors and workers, and consuming fuel and resources beyond the point of renewability. The key environmental problems associated primarily with these micro-enterprises are:

- Improper disposal and unsafe use of hazardous substances such as pesticides and chemicals,
- Inappropriate location of micro-enterprises in urban areas and their subsequent contribution to overcrowding and pressure on infrastructure such as water and sanitation services,
- Air pollution and particulate dust,
- Water pollution,
- Soil erosion,
- Natural resource depletion,
- Solid waste,
- Odor,
- Noise, and
- Health and safety risks.

Examples of SME subsectors with particularly high potential for environmental damage include:

- leather processing (tanneries),
- wet textile operations (e.g., bleaching and dyeing of cloth),
- food processing,
- brick and tile manufacturing,
- small-scale mining,
- metalworking, and
- wood processing and furniture-making.

### **3.4 Water and sanitation activities**

Although the human health benefits of **water and sanitation activities** are significant, and generally far outweigh any potential negative impacts, the potential for adverse environmental impacts from water and sanitation activities exists. Some potential environmental impacts are possible with these interventions, and will depend on the local circumstances, including:

#### *Water Supply*

- management and disposal of waste generated from construction activities;
- Improper siting of facilities that damages or destroys natural ecosystems (within wetlands, protected areas, or other sensitive habitats, etc.);
- Depletion or degradation of local or downstream freshwater resources (surface and groundwater);

- Creation of stagnant (standing) water near water points that could create breeding opportunities for water-borne disease vectors;
- Natural or human-caused biological or chemical contamination of water sources (surface and groundwater), causing increased human health risks, including:
  - ✓ High arsenic or other mineral/chemical levels
  - ✓ Poor management of water points and/or poor design of pipes leading to leakage and contamination of water with fecal matter, solid waste, etc.
  - ✓ This activity includes supplies of chlorine and other commercial products for water treatment which have the same impacts as pharmaceutical products.

#### *Sanitation*

- management and disposal of waste generated from construction activities;
- Increased human health risks from contamination of surface water, groundwater, soil, and food by human waste and disease pathogens;
- Degradation of surface and groundwater quality and land habitats due to inappropriate siting or construction of latrines or wastewater collection systems, or release of human waste from sanitation facilities;
- Defecation around locked or unusable latrines or other sanitation facilities, potentially contaminating surface water and/or shallow groundwater sources, adversely affecting both human and ecosystem health;
- Damage to the aesthetics of the sanitation facility site (visual, smell, etc.).

### **3.5 Environmental impacts of small-scale construction activities**

- **Disturbance to existing landscape/habitat:** Construction typically necessitates clearing, grading, trenching and other activities that can result in near-complete disturbance to the pre-existing landscape/habitat within the plot. If the plot contains or is adjacent to a permanent or seasonal stream/water body, grading and leveling can disrupt local drainage.
- **Sedimentation/fouling of surface waters.** Runoff from cleared ground or material stockpiles during construction can result in sedimentation/fouling of surface waters, particularly if the site is located in close proximity to a stream or water body. Such risks are particularly acute in the case of dam construction or rehabilitation where construction is within the stream or riverbed.
- **Stagnant water:** Construction may result in standing water on-site, which readily becomes a breeding habitat for mosquitoes and other disease vectors. This is of particular concern as malaria is endemic in Rwanda.
- **Adverse impacts of materials sourcing.** Construction requires a set of materials often procured locally: timber, fill, sand and gravel, bricks, etc. Unmanaged extraction of these materials can have adverse effects on the environment. For example, stream bed mining of sand or gravel can increase sedimentation and disturb sensitive ecosystems; purchase of timber from unmanaged or illegal concessions helps drive deforestation. Similarly, the operation of constructed facilities has a well-known set of potential adverse impacts.
- **General/institutional facilities and compounds** generate a set of waste streams (e.g., gray water, latrine discharge, solid waste). In general, if improperly managed, such wastes can contaminate ground and surface water, and create a breeding habitat for disease vectors, *et cetera*. For example, if latrine design or maintenance failure permits insects or other disease vectors free in-and-out access to the pit/tank, pathogens in human waste can be spread within the compound and to the nearby community. Similarly, spilling latrine waste during pump-out releases contained pathogens into the environment. Storing solid waste (usually a mixture of food scraps, packaging, and paper) in open containers creates a breeding habit for and attracts disease vectors such as rodents. Failure to design or maintain appropriate drainage structures can result in



standing water within the compound or on adjacent lands, which is of particular concern as malaria is endemic in Rwanda. Local erosion, including damage to adjacent fields, and sedimentation of nearby surface waters can also result. In general, the potential impacts of small-scale infrastructure construction and operation are controllable with basic good design and operating practices. However, the precise nature of the potential impacts—and the appropriate design and operating practices to mitigate them—are highly dependent both on location and the specific characteristics of the infrastructure. For these reasons, a sub-project environmental review process that considers specific issues of site and design is an appropriate approach to ensuring environmentally sound design and implementation.

#### 4.0 RECOMMENDED THRESHOLD DECISIONS WITH MITIGATION ACTIONS

##### 4.1 Recommended Threshold Decisions

Table 3 below summarizes the activities and recommended threshold determinations by activity.

**Table 3: Summary of Recommended Threshold Decisions for Activities**

<b>Activity</b>	<b>Recommended Threshold Determination and 22 CFR Part 216 Citation</b>
<p><b>African Evangelistic Enterprise • Ubaka Ejo</b></p> <ul style="list-style-type: none"> <li>- Technical assistance and capacity building to OVCs and other vulnerable populations to improve their health and social and economic well-being;</li> <li>- Provide technical assistance and training to increase support services for vulnerable groups, particularly orphans and vulnerable children (OVC's);</li> <li>- Provide training and capacity support for civil society and local government organizations that provide support for vulnerable groups;</li> <li>- Develop programs to facilitate increased basic education and vocational training for OVCs;</li> <li>- Provide training and facilitate the development of entrepreneurs and small businesses;</li> <li>- Develop community support groups for OVCs;</li> <li>- Facilitate access and usage of informal and formal financial services by promoting integrated savings and loans groups and linking these to microfinance institutions;</li> <li>- Provide linkages with agricultural extension services for cultivation of kitchen gardens;</li> <li>- Increase access to clean water through deepening and protection of springs.</li> </ul>	<p><b>Categorical Exclusion</b>, per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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, etc.).</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for water supply activities.</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for small scale construction activities.</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for activities involving support to small business.</p> <p><b>A Negative determination with conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for activities involving financial services,</p>

Activity	Recommended Threshold Determination and 22 CFR Part 216 Citation
	<p>and support to microfinance institutions (MFI).</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for small scale agricultural activities.</p>
<p><b>Francois Xavier Bagnoud Rwanda • Turengere Abana</b></p> <ul style="list-style-type: none"> <li>- Technical assistance and training to government and community-based organizations in improved nutrition; health behavior change</li> <li>- Technical assistance to improve access to health insurance, education support, child protection services, intensive case management; mentorship and psychosocial counseling;</li> <li>- Technical assistance to improve safe water and hygiene services;</li> <li>- Construction and maintenance of water supply/catchment facilities;</li> <li>- Provision of livelihood grants to community-based organizations</li> </ul>	<p><b>Categorical Exclusion, per 22 CFR 216.2 (c)(2)(i)</b> Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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, etc.).</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for water supply activities.</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for small scale construction activities.</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for support to small business activities.</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for provision of grants to local CSOs.</p>
<p><b>Caritas Rwanda • Gimbuka</b></p> <ul style="list-style-type: none"> <li>- Provide technical assistance and training to improve the nutrition and health of under-nourished children</li> <li>- Conduct growth monitoring and promotion of young children, supported by Community Health Workers, with a particular focus on children under the age of two years.</li> <li>- Conduct cooking demonstrations during Positive Deviance Hearth (PDH) sessions using locally grown foods to feed the moderately malnourished children;</li> <li>- Conduct counseling and nutrition education sessions, and one to one counseling of the mother with a malnourished child;</li> <li>- Monitoring and mentoring of PDH groups for improved performance</li> <li>- Monitoring and mentoring of the adoption of acquired skills from</li> </ul>	<p><b>Categorical Exclusion, per 22 CFR 216.2 (c)(2)(i)</b> Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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</p>

<b>Activity</b>	<b>Recommended Threshold Determination and 22 CFR Part 216 Citation</b>
<p>PDH groups at the household level,  Use of currently developed maternal, infant and young child nutrition, behavior change communication nutrition counseling tools for community-based nutrition activities;  Conduct monthly growth monitoring and promotion sessions for the children under two years;  Provide nutrition counseling to mothers and care givers to improve child feeding practices;  Provide health education sessions like hygiene promotion to reduce diarrheal infections;  Distribution of seeds for home garden production to improve food security.</p>	<p>affecting the environment (such as construction of facilities, etc.).</p> <p>A <b>Negative Determination</b> with Conditions is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for small scale agricultural activities.</p>
<p><b>Society for Family Health • Rwanda Social Marketing Program</b></p> <p>Provide technical assistance and training to improve the health of Rwandans by improving opportunity, availability and motivation for healthy behavior and use of health products and services;  Distribute social marketing products such as, oral and injectable contraceptives, insecticide treated nets, point of use water treatment products, micronutrient sprinkles;  Develop appropriate messaging to create demand for health products and services;  Develop and manage a cost-effective marketing, sales, and distribution network that improves access among key populations to branded health products;  Conduct analyses to increase availability of data and evidence to inform programming around key issues in HIV/AIDS, malaria, family planning and reproductive health, and maternal and child health.</p>	<p><b>Categorical Exclusion</b>, per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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, etc.).</p> <p>A <b>Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for: procurement, storage, management and disposal of public health commodities.</p> <p>A <b>Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for: provision and procurement of Long Lasting Insecticide Treated Nets (LLITNs).</p> <p>A <b>Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for water supply activities.</p>
<p><b>Global Communities • Higa Ubeho</b></p> <p>Provide technical assistance and training to increase access of vulnerable families to a network of high-quality preventive, curative and social services at the household and community level for the most vulnerable.  Provide technical assistance and training to link vulnerable groups to financial support services;  Conduct market value chain analysis and sub sector analysis to identify products and services in markets that are appropriate for</p>	<p><b>Categorical Exclusion</b>, per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as</p>

<b>Activity</b>	<b>Recommended Threshold Determination and 22 CFR Part 216 Citation</b>
<ul style="list-style-type: none"> <li>- vulnerable populations;</li> <li>- Increase the capacity of key government entities and local civil society organizations to improve monitoring and provide services for vulnerable populations at all levels</li> <li>- Facilitate private sector partnerships to address community priorities that cannot be addressed at the community level, such as transportation costs to services, transfer fees from clinics to district hospitals, and provision of nutritional support to inpatients at health facilities;</li> <li>- Facilitate access to credit</li> <li>- Increase food security and improve nutrition by promoting the use of kitchen and community gardens, Farmer Field Schools, and increasing access to inputs</li> </ul>	<p>construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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, etc.).</p> <p><b>Negative determination with conditions is</b> recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for activities involving support to small business.</p> <p><b>Negative determination with conditions is</b> recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for activities involving support to microfinance institutions.</p> <p><b>Negative determination with conditions is</b> recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for activities involving support to small scale agricultural activities.</p>
<p><b>FHI360 • Roads to a Healthy Future (ROADS) III</b></p> <ul style="list-style-type: none"> <li>- Provide technical assistance and training to build demand for, and build improved health service</li> <li>- Develop communications program for behavior change. Communication approaches will include community mobilization and outreach; peer education; special events; HIV and broader health education for vulnerable men.</li> <li>- Strengthen financial safety nets, maximizing household production and developing market readiness for smaller numbers of commercial producers, identifying opportunities by which Group Savings &amp; Loans Association (GSLA) members can be linked to external service providers from public, donor and private sectors</li> <li>- Build demand for and strengthen HIV testing and counseling services, building the skills among local implementers;</li> <li>- Strengthen capacity of PLHIV and their dependents in food production through kitchen gardening and other household food production.</li> <li>- Improve delivery of family planning and reproductive health services;</li> <li>- Support clusters and health facilities to improve WASH conditions among beneficiaries. This will include education and provision of water purification products and equipment for proper storage of drinking water, and education on recommended hygiene and sanitation practices;</li> <li>- Improve nutrition through health and nutrition education including demonstration sessions on preparing safe and balanced foods for infants and young children, promoting maternal nutrition needs, and other nutrition messaging;</li> <li>- Introduce food security techniques such as the production of orange-fleshed sweet potatoes and iron-rich beans, and small livestock rearing in order to promote increased household consumption of bio-</li> </ul>	<p><b>Categorical Exclusion</b>, per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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, etc.).</p> <p><b>Negative determination with conditions is</b> recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for support to small business.</p> <p><b>Negative determination with conditions is</b> recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for support to microfinance institutions.</p> <p><b>Negative determination with conditions is</b> recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for small scale agricultural activities.</p> <p><b>Negative determination with conditions is</b></p>

<b>Activity</b>	<b>Recommended Threshold Determination and 22 CFR Part 216 Citation</b>
fortified and protein-and micronutrient-rich foods	<p>recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for water supply activities.</p> <p><b>Negative determination with conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for promotion of public-private partnerships.</p>
<p><b>UNICEF – Multi-Sectoral District Plan – Community Based Nutrition</b></p> <ul style="list-style-type: none"> <li>- Provide technical assistance, training and conduct workshops to improve the capacity of government organizations, CSO and CBO to deliver nutrition-sensitive services,</li> <li>- Advocate for the improvement of improved nutrition and the provision of nutrition services for young children,</li> <li>- Provide technical and financial support to government organizations for nutrition rehabilitation for health facilities and scale up home fortification</li> </ul>	<p><b>Categorical Exclusion</b>, per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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, etc.).</p> <p><i>Note: As this activity is implemented through an international organization, it needs also to adhere to the required environmental guidelines of UNICEF.</i></p>
<p><b>Planned New Activity: Nutrition-Specific Activity with Community-based WASH Messaging</b></p> <ul style="list-style-type: none"> <li>- Technical assistance and training on appropriate nutrition interventions;</li> <li>- Institutional strengthening to government and civil society organizations working in nutrition;</li> <li>- Facilitate private sector investment in fortification of local foods and the development of nutrition-dense foods for local markets;</li> <li>- Develop and deliver appropriate nutrition messaging for various vulnerable groups;</li> <li>- Develop appropriate diets for various vulnerable groups (pregnant and lactating women, children 6-24 months) and assess their efficacy in improving nutrition;</li> <li>- Partner with other donors to develop a conditional cash transfer program for purchase of nutrition-dense foods and complementary feeding for infants</li> </ul>	<p><b>Categorical Exclusion</b>, per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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, etc.).</p>
<p><b>Planned New Activity: Rwanda Increased Protein for Dietary Diversity (RIPDD)</b> interventions under this activity as they are still in the early stages of development and details of activities are not yet well defined.</p>	<p><b>A deferral of a threshold determination, per 22 CFR 216.3(a)(7)(iii)</b>, is recommended for this activity.</p>

Activity	Recommended Threshold Determination and 22 CFR Part 216 Citation
<p><b>Planned New Activity: Water and Sanitation Infrastructure and Capacity Building</b></p> <ul style="list-style-type: none"> <li>- Technical assistance and training in the design and management of appropriate small-scale water and sanitation infrastructure;</li> <li>- Institutional support for local government entities in the management of water and sanitation facilities;</li> <li>- Development and implementation of water and sanitation policies;</li> <li>- Facilitation of private sector partnerships for the provision and management of water and sanitation services;</li> <li>- Design and construction of small-scale water infrastructure and sanitation facilities;</li> </ul>	<p><b>Categorical Exclusion, per 22 CFR 216.2 (c)(2)(i)</b> Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (xiv) 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, etc.).</p> <p><b>Negative Determination with Conditions</b> pursuant to 22 CFR 216.3(a)(2)(iii) for water supply and sanitation activities.</p> <p><b>Negative Determination with Conditions</b> pursuant to 22 CFR 216.3(a)(2)(iii) for small-scale construction activities.</p> <p><b>Negative Determination with Conditions</b> pursuant to 22 CFR 216.3(a)(2)(iii) for promotion of public-private partnerships.</p>
<p><b>Planned New Activity: Improved Services for Vulnerable Populations (ISVP)</b></p> <ul style="list-style-type: none"> <li>- Provide technical assistance, training and conduct workshops to increase the capacity of families and communities to provide healthy, nurturing, and engaging environments for vulnerable children under 5;</li> <li>- Provide technical assistance and training to link vulnerable groups to financial support services;</li> <li>- Increase knowledge, attitudes, skills, aspirations, and confidence of adolescents transitioning to adulthood;</li> <li>- Increase the capacity of communities to provide essential preventive and protective services to vulnerable families and children.</li> <li>- Increase the capacity of key government entities and local civil society organizations to improve monitoring and provide services for vulnerable populations at all levels</li> <li>- Increase food security and improve nutrition by promoting the use of kitchen and community gardens and Farmer Field Schools, including bio-fortified crops, to increase access to dietary diversity for vulnerable families, including children</li> </ul>	<p><b>Categorical Exclusion, per 22 CFR 216.2 (c)(2)(i)</b> Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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, etc.).</p> <p><b>Negative determination with conditions is</b> recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for activities involving support to small business.</p> <p><b>Negative determination with conditions is</b> recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for activities involving support to microfinance institutions.</p> <p><b>Negative determination with conditions is</b></p>

Activity	Recommended Threshold Determination and 22 CFR Part 216 Citation
	recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for small scale agricultural activities.
<p><b>Planned New Activity: Global Alliance for Improved Nutrition</b></p> <ul style="list-style-type: none"> <li>- Provide technical assistance, training, and conduct workshops to improve the management capacity of small and medium enterprises,</li> <li>- Provide grants to small and medium enterprises to improve production and processing capacity and efficiency,</li> <li>- Link small and medium enterprises to sources of credit,</li> <li>- Facilitate public-private partnerships,</li> <li>- Conduct analyses and make recommendations to address the constraints to the production and marketing of nutritious foods,</li> <li>- Make policy recommendations to improve the enabling environment for the manufacture of nutritious foods.</li> </ul>	<p><b>Categorical Exclusion, per 22 CFR 216.2 (c)(2)(i)</b> Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (xiv) 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, etc.).</p> <p><b>Negative determination with conditions is</b> recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for support to small business.</p> <p><b>Negative determination with conditions is</b> recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for support to microfinance institutions.</p> <p><b>Negative determination with conditions is</b> recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for provision of grants to small businesses.</p> <p><b>Negative determination with conditions is</b> recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for the promotion of public-private partnerships.</p> <p><i>Note: As this activity will be procured through a PIO grant to GAIN, it will have also to adhere to the organization environmental safeguard measures.</i></p>

Activity	Recommended Threshold Determination and 22 CFR Part 216 Citation
<p><b>Planned New Activity: Mobile Messages for the 1000 Days</b></p> <ul style="list-style-type: none"> <li>- Development of health education messages focused on reproductive health, pregnancy, nutrition, and/or early childhood education</li> <li>- Development of a mobile platform to allow the delivery of mobile messages to pregnant women, caregivers of children under 2, and other targeted populations</li> <li>- Training of community health workers to engage with clients on educational messages delivered through mobile platforms</li> </ul>	<p><b>Categorical Exclusion</b>, per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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, etc.).</p>
<p><b>Planned New Activity: Prevention for Key Populations</b></p> <ul style="list-style-type: none"> <li>- Provide technical assistance and training to build demand for, and build improved health service</li> <li>- Develop communications program for behavior change. Communication approaches will include community mobilization and outreach; peer education; special events; HIV and broader health education for vulnerable men.</li> <li>- Strengthen financial safety nets, maximizing household production and developing market readiness for smaller numbers of commercial producers, identifying opportunities by which Group Savings &amp; Loans Association (GSLA) members can be linked to external service providers from public, donor and private sectors</li> <li>- Build demand for and strengthen HIV testing and counseling services, building the skills among local implementers;</li> <li>- Strengthen capacity of PLHIV and their dependents in food production through kitchen gardening and other household food production.</li> <li>- Improve delivery of family planning and reproductive health services;</li> <li>- Support clusters and health facilities to improve WASH conditions among beneficiaries. This will include education and provision of water purification products and equipment for proper storage of drinking water, and education on recommended hygiene and sanitation practices;</li> <li>- Improve nutrition through health and nutrition education including demonstration sessions on preparing safe and balanced foods for infants and young children, promoting maternal nutrition needs, and other nutrition messaging;</li> <li>- Introduce food security techniques such as the production of orange-fleshed sweet potatoes and iron-rich beans, and small livestock rearing in order to promote increased household consumption of bio-fortified and protein-and micronutrient-rich foods</li> </ul>	<p><b>Categorical Exclusion</b>, per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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, etc.).</p> <p><b>Negative determination with conditions is recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for support to small business.</b></p> <p><b>Negative determination with conditions is recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for support to microfinance institutions.</b></p> <p><b>Negative determination with conditions is recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for small scale agricultural activities</b></p> <p><b>Negative determination with conditions is recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for water supply activities.</b></p> <p><b>Negative determination with conditions is recommended pursuant to 22 CFR 216.3(a)(2)(iii) with</b></p>



Activity	Recommended Threshold Determination and 22 CFR Part 216 Citation
	conditions for promotion of public-private partnerships.
<p><b>Planned New Activity: Social Marketing</b></p> <ul style="list-style-type: none"> <li>- Provide technical assistance and training to improve the health of Rwandans by improving opportunity, availability and motivation for healthy behavior and use of health products and services;</li> <li>- Distribute social marketing products such as, oral and injectable contraceptives, insecticide treated nets, point of use water treatment products, micronutrient sprinkles;</li> <li>- Develop appropriate messaging to create demand for health products and services;</li> <li>- Develop and manage a cost-effective marketing, sales, and distribution network that improves access among key populations to branded health products;</li> <li>- Conduct analyses to increase availability of data and evidence to inform programming around key issues in HIV/AIDS, malaria, family planning and reproductive health, and maternal and child health.</li> </ul>	<p><b>Categorical Exclusion</b>, per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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, etc.).</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for: procurement, storage, management and disposal of public health commodities,</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for provision and procurement of Long Lasting Insecticide Treated Nets (LLITNs)</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for water supply activities.</p>

Activity	Recommended Threshold Determination and 22 CFR Part 216 Citation
<p><b>Planned New Activity: OVC CSO Activities</b></p> <ul style="list-style-type: none"> <li>- Technical assistance and capacity building to OVCs and other vulnerable populations to improve their health and social and economic well-being;</li> <li>- Provide technical assistance and training to increase support services for vulnerable groups, particularly orphans and vulnerable children (OVC's);</li> <li>- Provide training and capacity support for civil society and local government organizations that provide support for vulnerable groups;</li> <li>- Develop programs to facilitate increased basic education and vocational training for OVCs;</li> <li>- Technical assistance and training to government, civil society and community-based organizations in improved nutrition; health behavior change</li> <li>- Develop community support groups for OVCs;</li> <li>- Provision of livelihood grants to community-based and civil society organizations</li> <li>- Provide nutrition counseling to mothers and care givers to improve child feeding practices;</li> <li>- Provide health education sessions like hygiene promotion to reduce diarrheal infections;</li> <li>- Provide training and facilitate the development of entrepreneurs and small businesses;</li> <li>- Facilitate access and usage of informal and formal financial services such as linking to microfinance institutions;</li> <li>- Provide linkages with agricultural extension services for cultivation of kitchen gardens;</li> <li>- Construction and maintenance of water supply/catchment facilities;</li> </ul>	<p><b>Categorical Exclusion</b>, per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); (xiv) 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, etc.).</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for water supply activities.</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for small scale construction activities.</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for activities involving support to small businesses.</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for provision of grants to small businesses, CBOs and CSOs.</p> <p><b>Negative determination with conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) with conditions for activities involving financial services, and support to microfinance institutions (MFI).</p> <p><b>A Negative Determination with Conditions</b> is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for small scale agricultural activities.</p>

#### 4.2 Recommended Threshold Decisions and Conditions

The table below (Table 4) summarizes the impact issues and conditions for different threshold determinations identified above.

**Table 4: Summary of Recommended Conditions and Mitigation Actions**

<b>Recommended Threshold Determination and 22 CFR Part 216 citation</b>	<b>Impact Issues &amp; conditions, mitigation or proactive interventions</b>
<p>Categorical Exclusion, per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); (iii) analyses, studies, academic or research workshops and meetings; (v) document and information transfers; (xiv) 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, etc.).</p>	<p>These activities will not have a direct effect on the environment and don't require further environmental review</p>
<p>A Negative Determination with Conditions is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for procurement, storage, management and disposal of public health commodities.</p>	<p>Consignees for all pharmaceutical drugs procured under this funding will be advised to store products according to the information provided on the manufacturer's Materials Safety Data Sheet (MSDS). These are supplied by the manufacturer, and can also be found on the internet by using active ingredients and MSDS as search terms. If disposal of these pharmaceutical drugs is required, due to expiration date or other reasons, the consignee will be advised that the preferred method of disposal is to return the product(s) to the manufacturer. If this is not possible (<i>e.g.</i>, if the expired or spoiled pharmaceuticals are considered hazardous and, if transferred across frontiers, become regulated and subject to the Basel Convention on the trans-frontier shipment of hazardous wastes) then follow the guidelines in the WHO document <i>Guidelines for Safe Disposal of Unwanted Pharmaceuticals During and After Emergencies</i>, found at <a href="http://www.who.int/water_sanitation_health/medicalwaste/unwantpharm.pdf">www.who.int/water_sanitation_health/medicalwaste/unwantpharm.pdf</a>.</p> <p>Implementing partners will make reasonable attempts to facilitate the disposal of expired drugs under this activity to mitigate the impact of medical waste.</p> <p>Implementing partners will work with GOR on all aspects of essential pharmaceutical supply chain management, including estimating demand, distribution, and storage issues of time and temperature.</p> <p>Packaging and disposal of other public health commodities will be treated using the guidelines provided in Environmental Guidelines for Small-Scale Activities in Africa (EGSSAA) 2nd Edition, Chapter 15: Solid Waste (<a href="http://www.encapafrika.org/EGSSAA/Word_English/solidwaste.doc">http://www.encapafrika.org/EGSSAA/Word_English/solidwaste.doc</a>).</p>
<p>A Negative Determination with Conditions is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for provision and procurement of Long Lasting Insecticide Treated Nets (LLITNs)</p>	<p>The acquisition, distribution or marketing of insecticide treated bed nets (ITNs), will require to use WHO-approved brands of long-lasting treated nets and adhere to all relevant stipulations made in the USAID Africa Bureau <a href="#">Programmatic Environmental Assessment for Insecticide-Treated Materials in USAID Activities in Sub-Saharan Africa</a> (ITM PEA). If a need for net treatment or re-treatment arises, the Health office will prepare and gain approval for a "Pesticide Evaluation Report and Safer Use Action Plan" (PERSUAP) for the ITN program before treatment or re-treatment of the nets. .</p> <p>The health office in coordination with implementing partners shall consider ways to manage the potential environmental threats (such as large solid waste effects and the effects of nets in water ways/for fishing) and ensure that appropriate language that</p>

	<p>advises users on the safe use of nets (which excludes the use as fishing nets) is communicated.</p>
<p>A Negative Determination with Conditions is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for support to small and medium agro-enterprises.</p>	<p>Agribusiness enterprises, particularly agricultural processing, can be the source of significant adverse environmental impacts, including BOD (biological oxygen demand) loading of surface waters, water source depletion, odors, and creation of habitat for disease vectors through improper waste disposal.</p> <p>Storage and sale of agricultural inputs pose hazards associated with improper disposal of containers (including chemical contamination of soil, ground and surface waters), worker and customer hazards, etc.</p> <p>Without appropriate environmental management practices at the facility level, assistance that increases the scale or number of such enterprises will tend to result in/increase such adverse impacts.</p> <p><b>Conditions:</b></p> <ul style="list-style-type: none"> <li>- Where assistance to specific enterprises is contemplated, a condition of support is that the enterprise employs (or will employ, as a result of the assistance) adequate environmental management techniques. These techniques must, at a minimum, satisfy obligations under Rwanda laws or policies. Where no such requirements exist, the enterprise must employ appropriate, common-sense practices to safely dispose of waste, minimize pollution of surface or groundwater, and safely store inputs and commodities</li> <li>- <b>Existing processing enterprises/facilities</b> receiving direct USAID support will be reviewed to identify any significant deficiencies in basic environmental management (see the GEMS Food Processing Cleaner Production Factsheet at <a href="http://www.usaidgems.org/mse/foodProcessing.htm">http://www.usaidgems.org/mse/foodProcessing.htm</a>) or compliance with Rwandan environmental and health requirements, and these deficiencies promptly corrected.</li> <li>- <b>Business development services for enterprises and cooperatives; and pilots and demonstrations</b> will (1) incorporate and promote sound environmental management practices (see GEMS Food Processing Cleaner Production Factsheet <a href="http://www.usaidgems.org/mse/foodProcessing.htm">http://www.usaidgems.org/mse/foodProcessing.htm</a>); (2) convey--and, in the case of demonstrations and pilots, and comply with--Rwandan environmental and public health requirements pertaining to these operations..</li> <li>- In addition to the elements above, <b>training for business development services providers</b> will, where appropriate, incorporate Cleaner Production (CP) approaches, and staff providing such training will have a working knowledge of CP concepts and basic CP skills at least equivalent to the content of the USAID/AFR ENCAP training course “Improving Success Rates of MSMEs through Cleaner Production” (<a href="http://www.encapafrika.org/sme.htm">www.encapafrika.org/sme.htm</a>).</li> <li>- Agricultural service providers benefiting from activities in this category will receive complementary TA emphasizing and fully integrating environmentally sound practices; as a practical matter, this may simply be integrated into planned BDS services.</li> <li>- Complementary TA to smallholders in sound agricultural practices (per section 3.4.) must be conducted in parallel with this activity.</li> </ul>
<p>A Negative Determination with Conditions is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for small scale agriculture activities</p>	<p>Potential environmental impacts of agriculture activities depend on the local circumstances and include</p> <ul style="list-style-type: none"> <li>- Ecological and Human Health-Surface water nitrification/eutrophication due to excrement flowing into streams, ponds, and other water sources which can affect the health of aquatic species and drinking water quality.</li> </ul>

	<ul style="list-style-type: none"> <li>- Ecological and Human Health-introduction of non-native species may cause unwanted competition, predation etc on native species. Non-native or non-regional species may compete with species that are naturalized (more likely to thrive) and critical to existing community food sources.</li> <li>- Ecological-destruction of habitat critical to the survival of threatened and endangered species, or habitats that support those species survival.</li> <li>- Human health exposure to parasites in animal excrement and to viruses</li> </ul> <p><b>Conditions</b> Application of appropriate guidelines and use of best practices in agriculture, including: applying the soil and water conservation technologies to protect land from degradation; and reclaim land that has been degraded and, using interventions that reduce habitat loss by increasing agricultural productivity and sustainability on already-farmed lands (using improved seed; using multiple cropping; using fertilizers, manures and irrigation and replacing old or inadequate irrigation systems; and rotating crops). For further details on the agricultural best practices, see, <a href="http://www.encapafrika.org/EGSSAA/Word_English/agriculture.doc">http://www.encapafrika.org/EGSSAA/Word_English/agriculture.doc</a>.</p>
<p>A Negative Determination with Conditions recommended pursuant to 22 CFR 216.3(a)(2)(iii) for support to micro-finance institutions and MSEs</p>	<p><b>Potential impacts</b> Without environmental due diligence in loan-making and technical assistance, increased finance for and technical assistance to MSMEs may increase the numbers of enterprises (and the scale of individual enterprises) that have potentially significant adverse impacts.</p> <p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>- USAID-capitalized MFIs will build basic environmental review ("due diligence") into loan-making processes.. Activities relating to the expansion of microfinance and or micro enterprise shall be subjected to environmental review. The Environmental Review Form in the EGSSAA shall be tailored as needed, to assist in identifying potential environmental impacts that are likely to occur as a result of such micro enterprise activities. The ERF helps to classify such potential impacts into low risk medium risk and high risk categories. Mitigation measures will be identified for all medium and high risk categories. (use guidelines in USAID Bureau for Africa’s <a href="#">Environmental Guidelines for Small-Scale Activities in Africa</a> (EGSSAA) Part III, “Guidelines for Micro and Small enterprises”)</li> <li>- MSEs &amp; MFIs shall receive training in the use of environment guidelines. The guidelines will illustrate how environmentally sound practices can be used to improve the effectiveness and efficiency. Training of MFIs will include the concept of environmental due diligence, awareness of the environmental hazards presented by typical types of enterprises, and basic environmental management appropriate to typical MSME activities.</li> <li>- Where technical assistance to MFIs includes loan-making procedures, basic environmental review will be built into loan-making processes.</li> <li>- The DO team(s) shall visit all such projects during implementation to ensure that they are not likely to cause any adverse environmental impacts, with a view to correcting and or initiating additional mitigation measures.</li> </ul>
<p>A Negative Determination with Conditions recommended pursuant to 22 CFR 216.3(a)(2)(iii) for promotion of public-private partnerships</p>	<p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>- Where assistance to specific enterprises is contemplated, a condition of support is that the enterprise employs (or will employ, as a result of the assistance) adequate environmental management techniques. These techniques must, at a minimum, satisfy obligations under Rwanda laws or policies. Where no such requirements exist, the enterprise must employ appropriate, common-sense practices to safely dispose of waste, minimize pollution of surface or groundwater, and minimize impacts on biodiversity.</li> </ul>

	<ul style="list-style-type: none"> <li>- In screening/identifying/recommending public-private agricultural investments or providing training related to such investments, environmental, health and safety risks (EHS) , compliance with GoR laws and regulations, and appropriate management practices to control these risks must be fully integrated and considered.</li> <li>- This must include identifying the need for EIA permits and licenses under the government of Rwanda.</li> </ul>
<p>A Negative Determination with Conditions recommended pursuant to 22 CFR 216.3(a)(2)(iii) for activities promoting seed quality certification, replication, and distribution systems to increase production of fortified crops and varieties</p>	<p>Direct seed replication, storage and distribution must substantially conform to good agricultural and irrigation practices as set out USAID’s Sector Environmental Guidance for Irrigation and Agriculture (<a href="http://www.usaidgems.org/sectorGuidelines.htm">http://www.usaidgems.org/sectorGuidelines.htm</a>).</p> <p>Where USAID supports 3<sup>rd</sup>-party (e.g. government of Rwanda) seed replication, storage and distribution indirectly, USAID assistance must advance these requirements for direct support enumerated above to the greatest extent practicable</p> <p>Crop varieties supported must be endorsed for use in Rwanda by the cognizant governmental authority.</p>
<p>A Negative Determination with Conditions recommended pursuant to 22 CFR 216.3(a)(2)(iii) for water and sanitation activities</p>	<p><b>Potential environmental impacts: Potential adverse impacts</b> from water supply activities can be summarized as follows:</p> <ul style="list-style-type: none"> <li>-Depletion of fresh water resources (surface and groundwater)</li> <li>-Chemical degradation of the quality of potable water sources (surface and groundwater)</li> <li>-Creation of stagnant (standing) water</li> <li>-Degradation of terrestrial, aquatic, and coastal habitats</li> <li>-Human health risks from a water source that becomes biologically or chemically contaminated.</li> </ul> <p><b>Conditions:</b></p> <p>Water supply and sanitation activities should be conducted in a manner consistent with the good design and implementation practices described in <i>EGSSAA Chapter 16: Water Supply and Sanitation</i>. Another useful reference to consult for good water and sanitation design and implementation principles is the document, “<a href="#">Guidelines for the Development of Small Scale Rural Water Supply and Sanitation Projects in Ethiopia.</a>” by Catholic Relief Services and USAID, July 31, 2003. For a compendium of humanitarian assistance expertise in 1) Hygiene Promotion, 2) Water Supply, 3) Excreta Disposal, 4) Vector Control, 5) Solid Waste Management and 6) Drainage, consult <a href="#">the Sphere Handbook (2004): Humanitarian Charter and Minimum Standards in Disaster Response, Chapter 2: Minimum Standards in Water Supply, Sanitation and Hygiene Promotion</a></p> <p>More specifically, the Mission shall ensure that the implementing partner develops and implements a Water Quality Assurance Plan that addresses how the partner will ensure the provision of safe drinking water to communities served under the subject activity. This Plan should be approved by the MEO and should assure that drinking water sources meet local and WHO water quality standards.</p> <p>Initial water quality testing is the responsibility of the program to assure, but when feasible, the program should also set in place capacities and responsibilities to provide reasonable assurance that ongoing water quality monitoring occurs. The standards for initial and ongoing testing -- types of contaminants for which testing should be conducted, testing methods, testing frequency, and issues such as public access to results should follow any applicable USAID guidance, as well as local laws, regulations and policies. Furthermore, a response protocol should be established in the event that water quality testing detects contamination.</p>

	<p>Among the water quality tests which must be performed are tests for the presence of arsenic. Any USAID-supported activity engaged in the provision of potable water must adhere to Guidance Cable State 98 108651, which requires arsenic testing. The USAID managing team must assure that the standards and testing procedures described in the following document are met: “<a href="#">Guidelines for Determining the Arsenic Content of Ground Water in USAID-Sponsored Well Programs in Sub-Saharan Africa.</a>”</p>
<p>A Negative Determination with Conditions is recommended pursuant to 22 CFR 216.3(a)(2)(iii) for provision of sub-grants to local CSOs</p>	<p>Given that details about the proposed activities are not yet fully developed, e.g. siting, the grantee or sub-grantee will be required to subject the proposed activities to an environmental screening process intended to identify potential environmental problems, appropriate mitigation measures, and to trigger supplemental environmental review if appropriate.</p> <p>Implementing partners will screen proposed activities according to the Africa Bureau Screening and Environmental Review Process, which is attached in Annex of this IEE.</p>
<p>Negative Determination with Conditions recommended pursuant to 22 CFR 216.3(a)(2)(iii) for small scale construction activities</p>	<p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>- <b>No complicating factors.</b> The site is not within 30m of a permanent or seasonal stream or water body, will NOT involve displacement of existing settlement/inhabitants, has an average slope of less than 5% and is not heavily forested, in an otherwise undisturbed local ecosystem, or in a protected area. Sites violating one or more of these criteria are subject to the determinations and conditions for Activity 4b, immediately below.</li> <li>- <b>Construction will be undertaken in a manner generally consistent with the guidance for environmentally sound construction</b>, provided in the Small Scale Construction chapter of the USAID Sector Environmental Guidelines. (<a href="http://www.usaidgems.org/sectorGuidelines.htm">http://www.usaidgems.org/sectorGuidelines.htm</a> ) At minimum, (1) During construction, prevent sediment-heavy run-off from cleared site or material stockpiles to any surface waters or fields with berms, by covering sand/dirt piles, or by choice of location. (Only applies if construction occurs during rainy season.); (2) Construction must be managed so that no standing water on the site persists more than 4 days; (3) IPs must require their general contractor to certify that it is not extracting fill, sand or gravel from waterways or ecologically sensitive areas, nor is it knowingly purchasing these materials from vendors who do so; (4) IPs must identify and implement any feasible measures to increase the probability that timber is procured from legal, well-managed sources.</li> <li>- <b>Asbestos.</b> If the presence of Asbestos is suspected in a facility to be renovated, the facility must be tested for asbestos before rehabilitation works begin. Should asbestos be present, then the work must be carried out in conformity with Government of Rwanda requirements, and in conformity with guidance to be provided by the MEO, in consultation with the REA. All results of the testing for asbestos shall be communicated to the C/AOR..</li> <li>- <b>Paint.</b> No lead-based paint shall be used, when lead-free paint is used, it will be stored properly so as to avoid accidental spills or consumption by children; empty cans will be disposed of in an environmentally safe manner away from areas where contamination of water sources might occur; and the empty cans will be broken or punctured so that they cannot be reused as drinking or food containers.</li> <li>- <b>Water supplies.</b> Where water supplies for drinking or other uses are upgraded or provided, the conditions applying to water supplies also apply.</li> <li>- <b>Waste handling equipment and infrastructure.</b> USAID intervention must result in the facilities’ possessing adequate provision for handling the wastes they may generate; including human wastes. Sanitation facilities are subject to the conditions applying to latrines.</li> </ul>

	- <b>No burnt brick.</b> Burnt brick shall not be used as a primary construction material. Limited use of burnt brick when alternatives are not feasible or suitable is permitted.
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**4.3. RESTRICTIONS, IMPLEMENTATION AND MONITORING**

**4.3.1 General restrictions:**

**GMOs/LMOs:** For purposes of compliance with USAID procedures, Genetically Modified Organisms (GMOs) or Living Modified Organisms (LMOs) are defined as “living organisms modified by genetic engineering techniques” and include, e.g., plants, microorganisms, live animal vaccines (if used outside a contained area and not approved in the US), animals, and insects.

This IEE does not authorize support for laboratory- or field-based research involving GMOs/LMOs, nor does it authorize support for multiplication or dissemination/open release of GMOs/LMOs. Support for laboratory research involving GMOs/LMOs in contained facilities would require an approved amendment to this IEE. Support for field testing or open release of GMOs/LMOs would require successful review under USAID’s Biosafety Procedures followed by an approved IEE amendment. Rwandan national requirements must be met in either case.

See the Biosafety Procedures Factsheet for more information:  
[http://www.usaidgems.org/Documents/complianceTopics/Biosafety\\_5Feb2010.pdf](http://www.usaidgems.org/Documents/complianceTopics/Biosafety_5Feb2010.pdf)

**Pesticides:** This examination does not cover pesticides, including their procurement, use, transport, storage or disposal. Any pesticide activity considered under this program would necessitate an amendment of this IEE and the preparation of a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP), in accordance with AFR Bureau guidance and fulfilling all analytical elements required by 22CFR216.3(b), USAID’s Pesticide Procedures.

**Fertilizers:** This examination does not cover fertilizers, including their procurement, use, transport, storage or disposal. Any activity including procurement, use, transport, storage or disposal of fertilizers would necessitate the amendment of this IEE

**4.3.2 General Project Implementation and Monitoring Requirements**

In addition to the specific conditions enumerated in Section 4, the negative determinations recommended in this IEE are contingent on full implementation of the following general monitoring and implementation requirements:

1. **Implementing Partner Briefings on Environmental Compliance Responsibilities.** The Mission shall provide each implementing partner with a copy of this IEE. Each implementing partner shall be briefed on their environmental compliance responsibilities by their Contracting/Assistance Officer’s Representative (C/AOR). During this briefing, the IEE conditions applicable to the implementing partner’s activities will be identified.
2. **Development of Environmental Monitoring and Mitigation Plan (EMMP).** Each implementing partner whose activities are subject to one or more conditions set out in section 4 of this IEE shall develop and provide for C/AOR review and approval an EMMP documenting how their project will implement and verify all IEE conditions that apply to their activities.



These EMMPs shall identify how the implementing partners shall ensure that IEE conditions that apply to activities supported under subcontracts and sub-grants are implemented. Annex 1 provides the recommended format for the EMMP. (In the case of large sub-grants or subcontracts, the IP may elect to require the sub-grantee/subcontractor to develop their own EMMP.)

(**Note:** The AFR EMMP Factsheet provides EMMP guidance and sample EMMP formats: [http://www.usaidgems.org/Documents/lopDocs/ENCAP\\_EMMP\\_Factsheet\\_22Jul2011.pdf](http://www.usaidgems.org/Documents/lopDocs/ENCAP_EMMP_Factsheet_22Jul2011.pdf))

3. **Integration and implementation of EMMP.** Each implementing partner shall integrate their EMMP into their project work plan and budgets, implement the EMMP, and report on its implementation as an element of regular project performance reporting.

IPs shall assure that sub-contractors and sub-grantees integrate implementation of IEE conditions, where applicable, into their own project work plans and budgets and report on their implementation as an element of sub-contract or grant performance reporting.

4. Integration of compliance responsibilities in prime and sub-contracts and grant agreements.
  - a. The Mission shall assure that any future contracts or agreements for implementation of CHAIN activities, and/or significant modification to current contracts/agreements shall reference and require compliance with the conditions set out in this IEE, as required by ADS 204.3.4.a.6 and ADS 303.3.6.3.e.
  - b. Implementing Partners shall assure that future sub-contracts and sub-grant agreements, and/or significant modifications to existing agreements, reference and require compliance with relevant elements of these conditions.

5. **Assurance of sub-grantee and sub-contractor capacity and compliance.** Implementing partners shall assure that sub-grantees and sub-contractors have the capability to implement the relevant requirements of this IEE. The implementing partner shall, as and if appropriate, provide training to sub-grantees and subcontractors in their environmental compliance responsibilities and in environmentally sound design and management (ESDM) of their activities. Annex II provides a recommended environmental screening form for sub-grants.
6. **USAID/Rwanda's monitoring responsibility.** As required by ADS 204.5.4, the Mission will actively monitor and evaluate whether the conditions of this IEE are being implemented effectively and whether there are new or unforeseen consequences arising during implementation that were not identified and reviewed in this IEE. If new or unforeseen consequences arise during implementation, the team will suspend the activity and initiate appropriate, further review in accordance with 22 CFR 216. USAID Monitoring shall include regular site visits.
7. **New or modified activities.** As part of its Work Plan, and all Annual Work Plans thereafter, implementing partners, in collaboration with their C/AOR, shall review all on-going and planned activities to determine if they are within the scope of this IEE.

If activities outside the scope of this IEE are planned, the USAID/Rwanda Health and Economic Growth Offices shall assure that an amendment to this IEE addressing these activities is prepared and approved prior to implementation of any such activities.

Any ongoing activities found to be outside the scope of the approved Regulation 216 environmental documentation shall be modified to comply or halted until an amendment to the documentation is submitted approved.

8. **Compliance with Host Country Requirements.** Nothing in this IEE substitutes for or supersedes implementing partner, sub-grantee and subcontractor responsibility for compliance with all applicable host country laws and regulations. The implementing partner, sub-grantees and subcontractor must comply with host country environmental regulations unless otherwise directed in writing by USAID. However, in case of conflict between host country and USAID regulations, the latter shall govern.

**ANNEX I - REGULATION 216 COMPLIANCE FOR USAID/RWANDA, CHAIN PROJECT- ENVIRONMENTAL MITIGATION AND MONITORING PLAN (EMMP)**

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An EMMP should be developed for all activities under this project that have at least one “Negative Determination with Conditions.” The implementing partner should usually lead development of the EMMP, subject to review and oversight by the MEO and A/COR. In all cases, the tasks identified in the EMMP are incorporated into the implementing partner’s Work Plan, budget, and reporting.

The following EMMP format is recommended. It can be adapted, as necessary.

**USAID/Rwanda**

USAID/Rwanda, Activity, Award Name and Number	
Date	
Name of Prime Implementing Organization	
Funding Period for this award: FY____ - FY____	
Name of Sub-awardee Organization (if this EMMP is for a sub):	
Current FY Resource Levels: FY	
Geographic location of USAID-funded activities (Province, District):	
This report prepared by	
Date of Previous EMMP for this organization	

<b>Category of Activity</b>	<b>Description of Mitigation Measures for these activities as required in Section 5 of IEE</b>	<b>Monitoring Indicator</b>	<b>Monitoring and Reporting Frequency</b>	<b>Party or Parties responsible</b>
Education, technical assistance, training, etc	Education, technical assistance and training about activities that inherently affect the environment includes discussion of prevention and mitigation of potential negative environmental effects	Discussion of environmental impact included in education, technical assistance, training and other materials	Annual	
List all activities in IEE that	If mitigation measures are well-specified in the	Specify indicators to (1) determine if	For example: “monitor weekly,	If appropriate, separately

received a “negative determination with conditions.”  Do not list any other activities.	IEE, quote directly from IEE  If they are not well-specified in the IEE, define more specifically here.	mitigation is in place and (2) successful.  For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)	and report in quarterly reports. If XXX occurs, immediately inform USAID activity manager.”	specify the parties responsible for mitigation, for monitoring and for reporting.

**EMMP Reporting form**

<b>List each Mitigation Measure in the EMMP</b>	<b>Status of Mitigation Measures</b>	<b>List any outstanding issues relating to required conditions</b>	<b>Remarks</b>

**Certification**

**I certify the completeness and the accuracy of the mitigation and monitoring plan described above for which I am responsible and its compliance with the IEE:**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Organization

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**BELOW THIS LINE FOR USAID USE ONLY**

**USAID/Rwanda, Clearance of EMMP:**

Agreement / Contracting Officer Representative: \_\_\_\_\_ Date: \_\_\_\_\_

Mission Environmental Officer: \_\_\_\_\_ Date: \_\_\_\_\_

As appropriate: REA, BEO [depending on nature of activity, which potentially may require an EA]

**Note:** if clearance is denied, comments must be provided to applicant

## ANNEX II: Environmental Screening Form for Sub Grants Proposed under USAID/Rwanda

All sub grants reviewed under this IEE must complete the “Environmental Screening Form” UNLESS the project or activity is carried out to address an emergency (*e.g.*, international disaster assistance). Emergencies are determined by the US Ambassador, not by the applicant. Per CFR §216.2(b)(1), most activities carried out under emergency circumstances are considered EXEMPT from environmental procedures, except for the procurement or use of pesticides.

The proposed activity cannot be approved and no funds may be committed until the environmental documentation, including mitigation measures, is cleared by the COR or the AOR, and approved by the USAID/East Africa Regional Environmental Advisor and the USAID/Rwanda Mission Environmental Officer (MEO). USAID may request modifications, or reject the documentation. If the activities are found to have significant adverse impacts, a full Environmental Assessment must be conducted.

The instructions for completing the Environmental Screening Form follow:

**Step 1. Provide requested “Applicant information”** (section A of the form)

**Step 2. List all proposed activities**

In section B of the form, list the proposed activities that are part of the new project. Once listed, they can be compared with those for which environmental determinations exist in the IEE. Include all phases: *planning, design, construction, operation & maintenance*. Include ancillary activities required to build or operate the primary activity. Examples include building or improving a road so that heavy vehicles can reach the project site, excavation of fill material or gravel for construction, provision of electricity, water, or sewage facilities, disposal of solid waste, etc.

**Step 3a. Screening: Identify low-risk and high-risk activities**

For *each* new activity you have listed in Section B of the form, refer to the list below to determine whether it is a listed low-risk or high-risk activity.

If an activity is specifically identified as “very low risk” or “high risk” in the list below, indicate this in the “screening result” column in Section B of the form.

<b>Very low-risk activities</b> (activities with low potential for adverse biophysical impacts including §216.2(c)(1))	<b>High -risk activities</b> (activities with high potential for adverse biophysical impacts including §216.2(d)(1))
<b>Provision of education, technical assistance, or training.</b> (Note that activities directly affecting the environment do not qualify.)  <b>Community awareness</b> initiatives  <b>Technical studies and analyses</b> and other information generation activities not involving intrusive sampling of endangered species or critical habitats.  <b>Document of information transfers</b>	<b>Substantial piped water supply and sewage construction</b>  <b>Large-scale borehole or water point construction</b>  <b>Large-scale irrigation</b>  <b>Large-scale water management structures</b> such as dams and impoundments  <b>Drainage of wetlands</b> or other permanently flooded areas

<p><b>Rehabilitation of water points</b> for domestic household use, shallow, hand-dug wells or small water storage devices. Water points must be located where no protected or other sensitive environmental areas could be affected.</p> <p>NOTE: USAID guidance on potable water requires water quality testing for arsenic, coliform, nitrates, and nitrites.</p> <p><b>Small-scale construction.</b> Construction or repair of facilities if total surface area to be distributed is under 10,000 sq. ft. (approx. 1,000 sq. m) (and when no protected or other sensitive environmental areas could be affected).</p> <p><b>Credit or financing.</b> Support for credit arrangements (when no biophysical environmental impact can be reasonably expected).</p> <p><b>Capacity for development.</b> Studies or programs intended to develop the capability of recipients to engage in development planning. (Does NOT include activities directly affecting the environment)</p> <p><b>Title II Activities.</b> Food for development programs under Title III of P.L. 480, when no on –the-ground biophysical interventions are likely</p> <p><b>Small-scale Natural Resource Management activities</b> for which the answer to ALL SUPPLEMENTAL SCREENING QUESTIONS (see <i>Natural Resources supplement</i>) is “NO.”</p>	<p><b>Large-scale agricultural mechanization</b></p> <p><b>Light industrial plant production or processing</b> (e.g., agro-industrial processing of forest products)</p> <hr/> <p><b>High-risk and typically not funded by USAID:</b></p> <p><b>Actions affecting protected areas and species.</b> Actions determined likely to significantly degrade protected areas, such as introduction of exotic plants or animals</p> <p>Actions determined likely to jeopardize threatened &amp; endangered species or adversely modify their habitat (esp. wetlands, tropical forests)</p> <p>Activities in forests, including:</p> <ul style="list-style-type: none"> <li>▪ <b>Conversion of forest lands</b> to rearing of livestock</li> <li>▪ <b>Construction of dams</b> or other water control structures that flood relatively undegraded forest lands</li> </ul>
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(This list of activities is taken from the text of 22 CFR 216 and other applicable laws, regulations, and directives)

**Step 3b: Identify activities of unknown or moderate risk.**

All activities NOT identified as “very low risk” or “very high risk” are considered to be of “unknown or moderate risk.” Common examples of moderate-risk activities are given in the table below.

Check “moderate or unknown risk” under screening results in Section B of the form for ALL such activities.

<p>Illustrative examples of moderate-risk activities</p> <p>If ANY of the activities listed in this table may adversely impact (1) protected areas, (2) other sensitive environmental areas, or (3) threatened and endangered species and their habitat, THEY ARE NOT MODERATE RISK. All such activities are HIGH RISK ACTIVITIES.</p>	
<p><b>Medium-scale construction.</b> Construction or rehabilitation of facilities or structures in which the surface area to be disturbed exceeds 10,000 sq. ft. (1000 sq meters) but funding level is \$200,000 or</p>	<p><b>Nutrition, DG care or family planning,</b> if (a) some included activities could directly affect the environment (e.g., construction, supply systems, etc.) or (b) bio-hazardous DG care waste (esp.</p>

less. (E.g. agricultural trading posts, community training centers).	HIV/AIDS) is produced, syringes are used, or blood is tested.
<b>Water provision/storage.</b> Construction or rehabilitation of small-scale water points or water storage devices for domestic or non-domestic use (Covers activities NOT included under “very low risk activities”)	<b>Institutional support grants to NGOs/PVOs</b> when the activities of the organizations are known and may reasonably have adverse environmental impact.
<b>NOTE:</b> USAID guidance on water quality requires testing for arsenic, nitrates, and coliform bacteria	<b>Sampling.</b> Technical studies and analyses or similar activities that could involve intrusive sampling of endangered species or critical habitats (includes aerial sampling).

#### Step 4. Determine if you must write an Environmental Review Report

Examine the “screening results” as they are entered in Section B of the form

- A. If ALL activities are “very low risk” then no further review is necessary. In Section C of the form, check the box labeled “very low risk activities.” Skip to Step 8 of these instructions.
- B. If ANY activities are “unknown or moderate risk,” you MUST complete an ENVIRONMENTAL REVIEW REPORT addressing these activities. Proceed to Step 5.
- C. If ANY activities are “high risk,” note that USAID’s regulations usually require a full environmental assessment study (EA). Because these activities are assumed to have a high probability of causing significant, adverse environmental impacts, they are closely scrutinized. Any proposed high-risk activity should be discussed in advance with USAID. In some cases, it is possible that effective mitigation and monitoring can reduce or eliminate likely impacts so that a full EA will not be required. If the applicant believes this to be the case, the Environmental Review Report must argue this case clearly and thoroughly. Proceed to Step 5.

#### Step 5. Write the Environmental Review Report, if required

The Environmental Review Report presents the environmental issues associated with the proposed activities. It also documents mitigation and monitoring commitments

For moderate risk activities, the Environmental Review Report is typically a SHORT 2-3 page document. The Report will typically be longer when (1) activities are or higher or unknown risk, and (2) when a number of impacts and mitigation measures are being identified and discussed.

The Environmental Review Report follows the outline below:

- A. **Summary of Proposal.** Summarize background, rational, and outputs/results expected. (Reference to proposal, if appropriate).
- B. **Description of activities.** For all moderate and high-risk activities listed in Section B of the form, succinctly describe location, siting, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during all project phases and who will undertake them. (all of this information can be provided in a table). If various alternatives have been considered and rejected because the proposed activity is considered more environmentally sound, explain these.
- C. **Environmental situation & Host Country environmental requirements.** Describe the environmental characteristics of the site(s) where the proposed activities will take place. Focus on site characteristics of concern – e.g. water supplies, animal habitat, steep slopes, proximity to human habitation, etc. With regard to these critical characteristics, is the environmental situation at the site degrading, improving, or stable? In this section also describe applicable host country environmental regulations, policies, or practices.



- D. **Evaluation of Activities and Issues with Respect to Environmental Impact Potential.** Include impacts that could occur before and during implementation of the activity, as well as any problems that might arise with abandoning, restoring or reusing the site at the end of the anticipated life of the facility or activity. Explain direct, indirect, inducted and cumulative effects on various components of the environment (*e.g.*, air, water, geology, soils, vegetation, wildlife, aquatic resources, historic, archeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc.)
- E. **Environmental Mitigation Actions (including monitoring).** Provide a work plan and schedule identifying the following:
- Mitigation measures.** Identify the means taken to avoid, reduce, or compensate for impacts. (For example, replanting of vegetation, compensation for any relocation of homes and residents.) If standard mitigation or best practice guidance exists and is being followed, cite this guidance (*e.g.*, the Umbrella IEE).
  - Monitoring.** Indicate how mitigation measures will be monitored to ensure that they accomplish their intended result. If some impacts are uncertain, describe the monitoring which will be conducted to identify and respond to these potential impacts.
  - Responsible Parties.** Identify *who* will undertake mitigation and who will conduct the monitoring, and at what frequency.
- Note:** Completion of this part of the ERR will satisfy the requirement of completing the Mitigation Plan (Part 2) of the EMMR. Where the EMMR asks for a description of mitigation measures, implementing partners and CTOs may refer to and cite the mitigating and monitoring actions they describe in Step 5, Section Ea-c, above.
- F. **Other information.** Where possible and as appropriate, include photos of the site and surroundings; maps; and list names of any reference materials or individuals consulted. (Pictures and maps of the site can substantially reduce the written description required in parts B & C)

**Step 6. Based on the environmental review, reach a recommended determination for *each* high-risk or unknown/moderate-risk activity**

For each high-risk or unknown/moderate-risk activity, the environmental review will help you decide between one of three recommended determinations:

- No significant adverse impacts. The activity in question will not result in significant, adverse environmental impacts. Special mitigation or monitoring is not required. Typically, this conclusion is not appropriate for high-risk activities.
- No significant adverse impacts given specified mitigation and monitoring. With mitigation and monitoring as specified in the Environmental Review Report, the activities in question will not result in significant adverse environmental impacts.
- Significant adverse impacts. The activities in question are likely to cause significant adverse impacts and cannot be mitigated with best practices or other measures. A full environmental assessment will be required.

For each high-risk or unknown/moderate-risk activity, indicate your “recommended determination” in Section B of the form.)

**Step 7. Summarize recommended determinations**

In section C of the form, summarize your recommended determinations by checking ALL categories indicated in Table 1.

**Step 8. Sign certifications** (Section D of form)

**Step 9. Submit form to USAID project officer.** Attach Environmental Review Report, if any.

**Environmental Screening Form for new USAID/Rwanda activities**

**A. Applicant Information**

<u>Organization:</u>	<u>Parent grant or project:</u>
<u>Individual contact and title:</u>	<u>Address, phone &amp; email:</u>
<u>Proposed activity (brief description):</u>	<u>Amount of funding requested:</u>
<u>Location of proposed activity (country(ies) and subregions within country):</u>	<u>Start and end date of proposed activity:</u>

**B. Activities, screening results, and recommended determination**

Proposed Activities (Continue on additional page if necessary)	Screening Result (Step 3 of Instructions)			Recommended Determinations (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities)		
	Very Low Risk	High Risk*	Moderate or unknown risk*	No significant adverse impact	With specified mitigation, no significant adverse impact	Significant adverse impact
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						

\* These screening results require completion of an Environmental Review Report

**C. Summary of recommended determinations (check ALL that apply)**

The proposal contains...	(equivalent Regulation 216 terminology)
<input type="checkbox"/> Very low risk activities	Categorical exclusion(s)
<input type="checkbox"/> After environmental review, activities determined to have <b>no significant adverse impacts*</b>	Negative determination(s)
<input type="checkbox"/> After environmental review, activities determined to have <b>no significant adverse impacts, given specified mitigation and monitoring*</b>	Negative determination(s) with conditions*
<input type="checkbox"/> After environmental review, activities determined to have <b>significant adverse impacts*</b>	Positive determination(s)*

\* for these determinations, the form is not complete unless accompanied by Review Report

**D. Certification:**

I, the undersigned certify that:

1. the information on this form is correct and complete
2. the following actions have been and will be taken to assure that the activity complies with environmental requirements established for this Project:
  - Those responsible for implementing this activity have received training in environmental review AND training and/or documentation describing essential design elements and best practices for activities of this nature.
  - These design elements and best practices will be followed in implementing this activity.
  - Any specific mitigation or monitoring measures described in the Environmental Review Report will be implemented in their entirety.
  - Compliance with these conditions will be regularly confirmed and documented by on-site inspections during the activity and at its completion.

(Signature)\_\_\_\_\_

(Date)\_\_\_\_\_

(Print name)\_\_\_\_\_

**Note: if screening results in *any activity* being designated “high risk” or “moderate or unknown risk,” this form is not complete unless accompanied by an environmental review report.**

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**BELOW THIS LINE FOR USAID USE ONLY**

**Clearance Record**

USAID/Rwanda A/COR <input type="checkbox"/> Clearance given <input type="checkbox"/> Clearance denied	(print name)	(signature)	(date)
USAID/Rwanda MEO <input type="checkbox"/> Clearance given <input type="checkbox"/> Clearance denied	(print name)	(signature)	(date)
USAID REA <input type="checkbox"/> Clearance given <input type="checkbox"/> Clearance denied	(print name)	(signature)	(date)
USAID BEO* <input type="checkbox"/> Clearance given <input type="checkbox"/> Clearance denied	(print name)	(signature)	(date)

BEO\* approval required for all “high risk” screening results and for determinations of “significant adverse impacts”