US Agency for International Development (USAID)
USAID/Armenia
Initial Environmental Examination (IEE)

Program/Project/Activity Data

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<th>Activity/Project Name:</th>
<th>A More Participatory, Effective and Accountable Governance</th>
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<td>Assistance Objective:</td>
<td>Governing Justly and Democratically; Investing in People</td>
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<td>Program Area:</td>
<td>A08 Good Governance; A10 Civil Society; A13 Social Services and Protection for Especially Vulnerable People</td>
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<td>Country(ies) and/or Operating Unit:</td>
<td>Armenia/E&amp;E</td>
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<td>Originating Office:</td>
<td>Democracy, Health and Social Reform Office</td>
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<td>Date: October 16, 2013</td>
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| PAD Level IEE: | Yes | No |
| Supplemental IEE: | Yes | No |
| RCE/IEE Amendment: | Yes | No |

| DCN of Original RCE/IEE: | DCN: |
| DCN of Amendment(s): | |

If Yes, Purpose of Amendment (AMD):

| DCN(s) of All Related EA/IEE/RCE/ER(s): | |
| Implementation Start/End: | LOP: FY14-FY18 |
| Funding Amount: | LOP Amount: $46,033,418 |
| Contract/Award Number (if known): | TBD |
| IEE Expiration Date (if any): | FY18 |

Recommended Environmental Determination:

| Categorical Exclusion: | Positive Determination: |
| Negative Determination: | Deferral: |

Additional Elements:

| Conditions: | Local Procurement: |
| Government to Government: | Donor Co-Funded: |
| Sustainability Analysis (included): | Climate Change Vulnerability Analysis (included): |

1. Background and Project Description

1.1. Purpose and Scope of IEE

The purpose of this PAD level IEE is to analyze potential environmental impacts and to recommend environmental determination for the new More Participatory, Effective and Accountable Governance Project (hereinafter referred to as “Project”) with a budget of $46,033,418 and an expected life of 5 years. If and when new information becomes available that indicates that changes to the activities under this Project covered by this IEE might be
considered major and their effect significant, or if additional activities are proposed that might be considered major and their adverse effect significant, or if activities added have activities that need to be mitigated with an EMMP, this PAD level IEE will be reviewed by the Mission in a Supplemental Initial Environmental Examination (SIEE) for concurrence by the BEO, and may have a different recommended determination.

1.2 Project Overview

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

The Republic of Armenia is a relatively small, mountainous, land-locked country with a total area of 29,740 km², located in the south-central Caucasus region of Eurasia. The country has a challenging development context because of its geopolitical constraints and unresolved conflict, energy dependency, limited economic and political competition, and population dynamics in the country.

Currently, the country faces a trade embargo and closed borders with Azerbaijan and Turkey. It is striving to develop a market based economy and become competitive worldwide. While growth has resumed to a certain degree since the global financial crisis, significant structural challenges remain. Growth typically benefits specific segments of society primarily located in urban areas in and around Yerevan. The poverty rate is 35.8% and unemployment is 20%, with youth unemployment at over double this figure.

GOAM has developed a new national development strategy called the Armenia Development Strategy (ADS) that covers the period of 2012-2025, which lays out four priorities of the socioeconomic development strategy:

1. Growth of employment – will be the focus of the first five years, with the aim of creating quality, well-paid jobs;
2. Development of human capital - will enhance the scope, quality and accessibility of primary services (including healthcare, education, culture and primary infrastructure);
3. Improvement of social protection system – will improve the effectiveness of current systems and their financial stability in the long-term, ensuring provision of comprehensive social guarantees, and reducing social risks and poverty; and
4. Institutional modernization of the public administration and governance – will improve the public efficiency, increase resources, improve service quality and accessibility, increase transparency in decision-making, and increase civil society participation in processes.

Within the priorities defined in the ADS, the GOAM has explicitly requested USAID technical assistance in pension reform, local governance, and e-governance.

The project will also develop civil society and the media’s roles as advocates and watchdogs of government effectiveness in relation to targeted reforms. As a result of the project, citizens and civil society organizations will be engaged in reforms – contributing to the competition of ideas and debate of public policy which are critical to the success of bottom up and inclusive democratic development.
Project Description

Summary of logical framework

More accountable, participatory and effective governance is critical to ensuring a well-governed Armenia in which progress, stability and more equitable prosperity are sustained over the long-term. A sober review of democracy and governance indicators to date shows progress is limited at best. In consultation with the Government of Armenia (GOAM), other donors and stakeholders, the Mission has developed a strategic vision for assistance in achieving more participatory, effective and accountable governance over the next five years. The Mission seeks to implement this strategic vision in part through the formation of a Development Objective Assistance Agreement (DOAG) with the GOAM.

As a result of implementing the project, USAID/Armenia expects the government to be more accountable to citizens’ concerns, especially at the local level; civil society and government to work collaboratively toward common objectives; the incidence and perception of corruption to decline with greater transparency; competition among levels of government to be enhanced; media and civil society to be more independent and sustainable; and social policy will protect marginalized groups.

Purpose: A More Participatory, Effective and Accountable Governance

The development hypothesis underlying the project (DO 2) is that more participatory, effective and accountable governance will result if (1) citizens are engaged in and exercising oversight over the policy process; and (2) policymaking and reform implementation are transparent and responsive to the citizenry; and 3) decision making authority is decentralized to the lowest competent level in government. USAID will therefore seek to enhance the competition of ideas through access to information and mechanisms that foster input and debate, and will seek to strengthen competition between branches and levels of government through accountability. USAID/Armenia will improve governance through a “learning by doing” approach to democratic processes. Checks and balances will be instilled in the participatory process in pursuit of mutually shared aims. Specifically, USAID will deliberately engage to strengthen key institutions, such as the National Assembly and local governments, to counterbalance the power of the Executive branch. Targeting reform areas where political will for reform and citizens’ interest converge, USAID/Armenia will aim to make governance more transparent, participatory and responsive to citizens. The Mission will engage civil society at the front end and back end of reform as advocates and watchdogs. At the same time, the Mission will build civil society’s capacity to more productively engage policymaking and reform implementation. Through this collaborative approach, civil society will gain a sense of accomplishment as reforms progress, transparency increases and efficiencies are gained; while the government will gain valuable input, legitimacy, and support in realizing reforms while mitigating corruption.

Output (Sub Purpose 1): Increased civic engagement in and oversight of democratic and social reforms

USAID will strengthen civil society’s ability to aggregate and advocate for citizens’ interests and thereby bolster their legitimacy and independence from donor funding. Targeting rural
areas, USAID will work to improve participation, transparency/accountability and good governance. Assistance will promote new types of civic engagement, increase the sophistication civic actors’ ability for policy formulation, improve access to alternative and reliable media and information sources; and expand citizen awareness and understanding of public policies. USAID’s approach will emphasize enlarging the nexus in which government reform and citizen engagement meet by increasing citizen access to reliable sources of information and strengthening the capacity, coordination, and networking of civic actors. USAID will equip civic organizations representing both public and private interests with the resources required to define their aspirations, support their goals, and advocate for reforms to achieve those goals. USAID will pay special attention to supporting youth and women to play a greater role in civic and political life.

To enhance civil society’s capacity to play a more effective oversight and watchdog role, USAID will provide support to civil society organizations, including NGOs, foundations, think tanks, research centers, community-based organizations, and traditional and social media outlets, to improve their abilities to analyze government performance in a systematic, evidenced-based manner, monitor government reform processes, assess impact of reforms, and hold government officials accountable.

Assistance to be carried out may include:

- improving civil society’s ability to engage citizens and articulate their interests;
- monitoring of government institutions, officials and policy process;
- increasing citizen access to independent and reliable information;
- promoting enabling environment for civil society sustainability;
- establishing civil society mechanisms to monitor progress and impact national level reforms.

Output (Sub Purpose 2): More open and responsive policymaking and implementation

Support under this IR will be directed at policy making institutions, including target ministries, local governments, and the National Assembly. USAID will work with both national and local level government institutions to establish and strengthen mechanisms and processes to enhance citizen participation and increase transparency. USAID will provide assistance to reach mutually agreed upon benchmarks for achieving progress holding regular town hall meetings, publishing draft policies and legislation, instituting e-governance, developing protocols that foster participation are all examples of the mechanisms that USAID will support to encourage civil society-government collaboration. Because the National Assembly has the potential to play a key policy making role, USAID will provide assistance to parliamentary committees to strengthen the debate, public input, evidence-based analysis, and rigor involved in the legislative process.

With respect to promoting decentralization and strengthening local governance, USAID may include technical assistance to the Ministry of Territorial Administration to implement the government’s strategy to enhance the authority and capacity of local governments and develop rural areas, facilitating participatory approaches, generating local income, and managing fiscal resources. With respect to providing assistance in the government’s efforts to fight corruption, USAID may provide assistance to the Ministry of Justice to implement e-governance public
services systems or to the Ethics Commission for High-Ranking Officials to strengthen it organizationally and help it better achieve its functional purposes. USAID/Armenia will also play an important role in assisting relevant government institutions to administer a sustainable pension system. This important social reform will increase civic trust in public services as well as improving government effectiveness and sustainable service delivery of a national program. USAID will also help create and strengthen mechanisms and institutions for government, citizens, media, and civic actors to effectively monitor the implementation of democratic reforms. If both government and non-governmental institutions monitor the development, plans, and implementation of reforms, then they will more likely be fully carried out, providing momentum for further reform. The media has an important role to play in monitoring reform, as do think tanks and interest groups.

Assistance to be carried out may include:

- strengthening policy process and mechanisms for civic monitoring of government institutions;
- improving the government’s ability to apply open and participatory policy processes;
- strengthening municipal technical capacity to provide service delivery and make decision making more transparent;
- establishing government-supported mechanisms to monitor progress and impact national level reforms.

Employing a democratic and participatory approach to advancing reform across sectors, the impact of this project’s interventions will permeate the entire portfolio and not be limited to traditional areas. Working more collaboratively with the government, the Mission will employ a “learning by doing” approach using the reform areas as tools to develop and reinforce a set of key competencies, institutions, and practices within civil society and the government. Civil society and the media have vital roles to play in ensuring government effectiveness in reform as advocates and watchdogs while also promoting the government’s own capacity to monitor its progress toward reform. Through this collaborative approach, civil society will gain a sense of accomplishment as reforms progress, transparency increases and efficiencies are gained; while the government will gain valuable input, legitimacy, and support in realizing reforms while mitigating corruption.

**Summary of Project Activities**

The following activities will directly contribute to the achievement of project results:

**1) Increased civic engagement in and oversight of reforms improved and sustained**

- Activity to support CSO Consortia in three policy areas (Local Governance/Decentralization, Good Governance/Anti-Corruption and Social Policy)

USAID/Armenia will fund three civil society-led programs aimed at strengthening civil society engagement in and oversight of selected, high priority reforms implemented by the Government of Armenia (GOAM). Assistance provided to civil society organizations (CSOs)
will complement USAID assistance in the three reform areas in which GOAM requested assistance - decentralization, transparency and accountability, and social services.

The overall objective of these activities is to ensure that key government reforms reflect the interest and needs of Armenian citizens and other stakeholders, citizens are engaged in the reforms process, and civil society and the media are able to hold the GOAM accountable for implementation of selected reforms. USAID/Armenia will fund three consortia of CSOs, one in each policy reform area - namely - for a period of up to five years. Each consortium will pursue common results in citizen engagement, advocacy, access to information and sustainability of the sector in relation to the reform area. By funding Armenian civil society organizations directly, USAID expects to increase sustainability and CSO ownership over end results. By developing the capacity and leadership of CSOs as lead implementers, CSOs will be strengthened to advocate on behalf of citizens and civil society long after USAID funding ends.

- **Activity to Strengthen Media’s accessibility, reliability and independence**
  To increase citizen access to independent and reliable sources of information on the GOAM’s policies and reforms, the Mission will support a five-year activity in which technical assistance and grants will be provided to local media outlets and organizations. While specifically focusing on selected reforms, the activity will strengthen media capacity to meet professional standards and foster independent media that better serves democratic consolidation and good governance in general. The activity is expected to lead to an increased number of independent media producing quality content on the local and national levels and giving voice to local concerns at the national level.

- **Activity to expand and equip pool of technically and organizationally strong local partners (DGP)**
  If funding is secured, USAID/Armenia intends to support a capacity strengthening service program to expand the pool of quality and organizationally strong local partners across different sectors. This program will complement USAID’s strategy in which a significant portion of its assistance will go directly to local organizations to spearhead the promotion and oversight of reforms. Moreover, civil society organizations will play a key role in promoting better economic, political, and social governance in all the sectors the Mission will be supporting. Institutionally-equipped local partners, including civil society organizations, think tanks, associations, and media actors, are critical to the success of reforms and USAID’s new approach across the portfolio. Through grants and technical assistance provided through local intermediary or intermediaries, USAID will broaden the number of organizations that can effectively manage significant budget resources, have significant technical expertise, and can collaborate successfully with other organizations to achieve overarching objectives.

- **Support to peace corps small project assistance program (SPA)**
  The Small Project Assistance (SPA) Program, funded by the USAID and implemented by the Peace Corps enables USAID to have a direct development effect in selected priority areas, while supporting Peace Corps Volunteers to engage community members in participatory processes that contribute to capacity-building and sustainable development. The Framework for U.S. Foreign Assistance identifies five strategic objectives. SPA community grants and technical assistance activities contribute to four of these five objectives: Governing Justly and
Democratically, Investing in People, Economic Growth, and Humanitarian Assistance. At the inception of the SPA program, a Special Objective was developed by USAID and Peace Corps to express the program’s purpose: to increase the capabilities of local communities to conduct low-cost, grassroots sustainable development. Within the scope of this overarching objective, the SPA program responds to the mutual interests of both USAID missions and Peace Corps posts. The Special Objective remains a guiding principle, unifying the SPA program across the diverse sectors and regions in which it operates. Financial resources provided by USAID missions allow Peace Corps Volunteers and their local counterparts to identify capacity-building opportunities, and subsequently obtain the knowledge and skills needed to implement a broad range of grassroots development activities. In the process, Peace Corps Volunteers help remote communities, often beyond the direct reach of USAID-funded projects, to become more self-reliant and to establish linkages to larger NGOs and/or government programs that are often supported by USAID.

(2) More open and responsive policymaking and implementation
Support under this component will be directed at policy making institutions, including target ministries, local governments, and the National Assembly. USAID will work with both national and local level government institutions to establish and strengthen mechanisms and processes to enhance citizen participation and increase transparency. USAID will provide assistance to reach mutually agreed upon benchmarks for achieving progress holding regular town hall meetings, publishing draft policies and legislation, instituting e-governance, developing protocols that foster participation are all examples of the mechanisms that USAID will support to encourage civil society-government collaboration.

With respect to promoting decentralization and strengthening local governance, USAID will include technical assistance to the Ministry of Territorial Administration to implement the government’s strategy to enhance the authority and capacity of local governments and develop rural areas, facilitating participatory approaches, generating local income, and managing fiscal resources.

With respect to providing assistance in the government’s efforts to fight corruption, USAID will provide assistance to the Ministry of Justice to implement e-governance public services systems or to the Ethics Commission for High-Ranking Officials to strengthen it organizationally and help it better achieve its functional purposes.

Social policy is one of the key reform areas that USAID/Armenia will assist the GOAM and civil society to implement and to improve Armenia’s social protection system and social services, particularly for the most vulnerable populations. The Mission will also assist relevant government institutions building their capacity to administer a sustainable pension system, integrated social services, and community-based services for vulnerable populations, including the disabled and children. These important social reforms will go a long way towards increasing civic trust in public services as well as improving government effectiveness and sustainable delivery of services.

- **Pension Reform Implementation Project**

  The cornerstone of the GOAM’s old-age poverty reduction program is its new multi-pillar pension system. With USAID support, the GOAM finalized and adopted its Pension Reform
Program that recommended a complete overhaul of Armenia’s inadequate and inefficient public pension system. In December 2010, the National Assembly of the Republic of Armenia approved a package of pension reform laws (individual recordkeeping, public pay-as-you-go pensions, and mandatory retirement savings accounts). The pension reform law provides for a funded pension pillar to be introduced in 2014. USAID will continue providing assistance to the GOAM to implement the new pension system and technical assistance will be provided to ensure that the pension system as a part of an integrated social services system is well-managed, regulated, and supervised. The activity will strengthen Armenia’s social protection system, increase opportunities for citizens’ self-reliance, reduce dependence on the public support to meet basic needs and ensure greater old-age income security. The activity has two key components: 1) institutional and human capacity building and 2) information system integrity and safeguards. USAID’s assistance will also promote increased civic engagement to ensure that users and beneficiaries of the social services system receive the care and services needed in a timely, efficient, and effective manner.

- **Through the LSGA mechanism USAID will support MLSA in the implementation of the model of Integrated Social Services (one-stop-shop for social services)**

This activity includes pensions, child welfare, disability and all other social services. A “single window services” model will create necessary conditions for delivering high quality and new type of services to beneficiaries and create necessary basis for cooperation among different social service providers. With USAID technical assistance it is expected to define the basic model of Integrated Social Services Delivery, identify all problems and challenges and address those, and based on these steps review all business processes, services, methods of delivering social services, as well as introduce appropriate information systems and other management tools. The LSGA consists of four components: Legal Framework for the Integrated Social Services System, Preparatory activities towards creation of new Comprehensive Social Services Centers (CSSCs- one stop-shop centers), Start-up project on Resource Center for Integrated Social Services and Development of monitoring and qualitative and quantitative evaluation methodology for CSSCs.

- **Through the LSGA mechanism USAID will support MLSA to carry out widespread public awareness campaigns and implement effective financial literacy projects in by supporting the Pension System Awareness Center Foundation (PSACF).**

This activity will help the PSACF to enhance the established institutional system of delivering general financial literacy, public awareness, and customer response and support mechanism in Armenia pension system. This activity will complement the work that USAID will perform under the Pension Reform implementation (PRIP) program, Finance for Economic Development Program (FED), Tax Reform Program (TRP), as well as the World Bank, which provided a grant to support development of the Unified Pension Portal and the Unified Pension Hotline Service.

- **Labor Market Integration of People with Disabilities**

USAID will continue providing assistance to promote equal employment opportunities and access to employment as a basic human right for people with disabilities. The ongoing activity supports the GOAM to develop an effective model for provision of employment services to people with disabilities (PWDs). Through this activity, USAID will continue providing
technical assistance to the GOAM, services to beneficiaries and institutional capacity building. Capacity building has three main components: (1) creation and/or further development of a coherent set of services related to vocational skills assessment, professional skills development, and professional rehabilitation of persons with disabilities; (2) provision of recommendations and assistance to GOAM in implementing relevant policy/administrative changes or reforms where necessary; and (3) an increase in public awareness on access and employment rights of PWDs. The activity will create opportunities for hundreds of PWDs to obtain competitive professional skills and knowledge to secure jobs, and internship opportunities.

- **Child Protection**

USAID plans to support the GOAM’s national child welfare reform to stop the flow of children into institutions and systematically reduce the number of children in institutional care by developing alternative social services aimed at children and families. Improved community level social services and policy reform will create the conditions for deinstitutionalizing orphans and vulnerable children. GOAM recognizes de-institutionalization as a priority and has committed to establish community-based alternative services and family type care services. The interventions will include but are not limited to: (i) refinement of the legal and regulatory framework to better respond to child welfare; (ii) building of the GOAM’s institutional and human resource capacity to ensure smooth transition from residential care to community-based alternative services; (iii) establishment of prevention services within recently launched Integrated Social Services reform; (iv) partnership with media and civil society to promote social inclusion of children deprived of parental care and children with disabilities.

- **Activities to Support Decentralization**

Decentralizing decision-making authority and service delivery to a lowest competent level will bring governance down to where the distance between citizens and government is the closest. Citizens will get more out of the government and, in turn, will be more willing to engage in governance if decentralizing authority and administration begin at a more viable municipal level that directly affects daily life.

Within this rationale, the Mission intends to support an activity to: (a) assist the GOAM’s Ministry of Territorial Administration (MTA) to successfully implement decentralization reforms, and (b) develop the institutional capacity of municipal governments to effectively administer their new level of authority within a decentralized system. The activity will provide technical assistance to the GOAM on the national and sub-national level to increase more democratic, decentralized and responsive local governance.

- **Activities to support good governance and GOAM’s commitments to transparency and accountability**

USAID will assist the GOAM in increasing transparency and gain efficiencies in administration to mitigate opportunities for corruption. Support for e-governance will reduce contact between the public and civil servants, reducing administrative discretion and opportunities for corruption. USAID will support GOAM in the development of mechanisms for internal monitoring of progress on targeted reforms, a critical element of their ability to taking ownership of those reforms, learn as they go along, and adapt strategies to fit changing circumstances. Transparency of these monitoring systems – both in terms of methodologies and results – will be paramount.
USAID's support for Increased Transparency and Accountability will include support for the development and application of 21st century initiatives and technologies to help advance democracy, human rights and governance objectives by using technology to link and elevate the voices of citizens, help governments communicate policies and reforms with citizens, help governments listen and respond to citizen input, and promote online transparency for government information and services in order to develop accountable and transparent institutions and economic policies.

Through technical assistance and grants, the Mission will support the GOAM in meeting stated commitments for reforms in good governance and increased transparency such the Open Government Partnership.

Through G2G, the Mission will provide funds to the Ministry of Justice to develop centralized services through a “one-stop shop” principle to natural and legal persons and creating single servicing centers for the maintenance of public registers. Assistance may include standardizing e-services and supporting individual government ministry initiatives to simplify processes.

Through G2G the Mission will provide funds through the Ministry of Finance to the Ministries of Energy and Natural Resources and Nature Protection for digitizing data and/or maps containing information about mineral deposits and mining concessions as part of a general effort to work toward compliance with Open Government Partnership extractive industry disclosure practices.
2. Baseline Environmental Information

2.1 Locations Affected and Environmental Context

General Baseline Data:

Armenia has demonstrated its resilience in the face of severe economic downturns and instability since independence. Notwithstanding these difficulties, Armenia has made significant strides in reducing poverty, improving health outcomes, developing civil society and laying the foundations for economic growth, and USAID has provided assistance in support of these efforts for 20 years. However, development challenges still exist which confront Armenia’s further transition to democratic governance and broad-based prosperity. More accountable and participatory governance is critical to ensuring a well-governed Armenia in which environmentally friendly growth, stability and more equitable prosperity are sustained over the long-term. A sober review of democracy and governance indicators to date shows progress is limited at best.

Environmental professionals and civil society representatives advise that enforcement of legislation is a big issue in Armenia. This is due to a lack of capacity and staffing constraints, budget constraints, corruption and weak data. There is also limited transparency and public participation in government decision making on environmental issues, despite the provisions of the Armenia Environmental Impact Assessment (EIA) law. All these reflect a lack of political will and weak governance to protect and conserve natural resources.

Sector Specific Baseline Data:

- **Citizenry**: According to a national think tank, the ten wealthiest people control more than 55 percent of the total wealth in the country. Disillusioned with growing disparities in wealth and marginalized by the centralized and opaque political system, citizens have very low levels of trust in government institutions. In the absence of opportunities for meaningful political engagement, civic apathy runs high and civic engagement is weak. A legacy of the former political system, 69 percent of citizens continue to view the government as a “parent” versus a “client” or patron-client relationship. This perception contributes to the citizenry’s weak commitment to holding government accountable as well as high expectations for what the government should provide for its citizens. According to Caucasus Barometer surveys, a clear majority of Armenians do not consider the existing regime to be democratic. While most Armenians state a belief in democracy as the preferred political system, further analysis of data reveals that citizens’ expectations for democracy are strongly associated with a higher level of economic development and better social protection. As a result, protection of economic and social rights and security take priority over political and civic freedoms.

- **CSOs**: CSOs’ dependency on donors has often precluded them from developing expertise in any particular sector. For this reason among others, CSOs’ credibility is compromised as they are perceived in the broader public as “grant eaters.” CSO presence is limited in rural areas where marginalized populations could benefit most from their representation. Distanced from citizens, CSOs are not adept at aggregating and expressing their interests. Research conducted by CRRC concludes that there is a lack of mutual trust between...
government and CSOs. According to the study, CSOs believe that the government marginalizes their involvement in the policy making cycle and the government claims that some CSOs lack the necessary expertise to constructively engage in this process. CSOs’ poor relations with government constrain their ability to play a greater role in governance. However, there are growing examples of successful engagement in which the government realizes the expertise CSOs can bring to enhancing service delivery and policy formulation. For their part, CSOs must acquire more sophisticated skills and develop stronger constituencies in order to play a greater role in policymaking, planning and implementation.

- Local Governance/Decentralization: Rural areas have the highest levels of poverty, and marginalization is the greatest. With over 900 municipalities, which vary greatly in population size, Armenia faces significant challenges in administering regional development. Municipal tax revenues are insufficient to cover costs and municipal administration is a growing burden on the central budget. Per the recommendations of the DRG Assessment, one of the best opportunities for economic, political and social development is developing local governance. Strengthened municipal governance also holds the greatest chances for addressing the concentration of power – a key constraint to better governance. Strengthening democratic governance at the local level – where the space between citizens and government is the closest - can serve as a model for participatory and responsive governance on the national level. Decentralization also provides an opportunity for better civic representation at the local levels where marginalization of disadvantaged populations is the greatest. At the same time, the Mission will assist the GOAM in implementing its priority for municipal reform.

- Good Governance/Anti-Corruption: Corruption in public service delivery exacts an economic cost and contributes to public disillusionment with democracy. The most recent findings of Transparency International’s Global Corruption Barometer identified the health sector as the most corrupt, followed by the police and judiciary, and then public officials. Businesses routinely complain about corruption plaguing tax and customs administration. Institutions established to play a watchdog role in corruption remain shallow with inadequate enforcement capacity. Citizens and the government alike have clear incentives for mitigating corruption and improving the transparency and efficiency of public services.

- Social Sector Reform
  - Pension: Old-age poverty is a major issue; the average pension is less than the poverty level. As life expectancies increase and young workers emigrate, the share of the pensionable age population steadily increases. Armenia’s current pension system is not financially viable. About 72 percent of all social benefits are paid to pensioners, leaving very little for other programs. Public revenues are insufficient to meet the growing demand for benefits under the current system.
  - Disability: Of the nearly 200,000 persons with disabilities, only eight percent were employed. Persons with disabilities face social and economic exclusion making them vulnerable to poverty. A person with a disability is more than ten times more likely to be unemployed than persons without disabilities. Increasing the employability of the disabled will play an important part in reducing their vulnerability to poverty and dependency on government services. In turn, the government benefits from more viable services for the disabled and reduced burden on state services.
  - Child Protection: Eighty percent of the 4,900 children residing in Armenia’s 50 state institutions have at least one living parent, according to research by UNICEF. At the
same time, the National Statistical Service reports that the number of children living in orphanages is increasing. A recent study found that there is weak consensus on how to provide special services without institutionalizing children or how to make more flexible services available in order to reunite families.

- **Domestic Violence**: Gender-based violence is one of the most prevalent forms of violence in Armenia. Recent research indicates that nearly 60 percent of women have been subject to domestic violence, with up to 25 percent experiencing physical violence. In 2012, women were killed as a result of DV. Laws do not adequately protect women, enforcement is lacking, and services are scarce. Societal norms exacerbate the issue. The 2010 Armenian Demographic and Health Survey showed that 9.3 percent of women and 19.9 percent of men thought wife beating was justifiable.

### 2.2 Description of Applicable Environmental and Natural Resource Legal Requirements Policies, Laws, and Regulations

The project will positively impact access to environmental information, public participation in environmental decision making and access to justice in compliance with Aarhus Convention, to which Armenia is a party and law on Environmental Impact Assessment with respective regulations.

The project may be relevant to the stipulations of the Law in Populations Environmental Education and Upbringing, as it refers to standards for teaching environment.

Waste management is the principal issue in the Republic of Armenia (RA) and it is regulated through RA International Agreements, RA Constitution, RA Law on Waste and a number of other legal acts. RA Law on Waste adopted on November 24, 2004 is a key piece of legislation regulating relations on waste collection, storage, transportation, processing, recycling, removal and volume reduction. The main objectives and principles of the law are establishment of a unified state policy in the area of waste management, provision of conditions and requirements for an environmentally friendly policy on waste management, provision of economic incentives for resource-saving activities, avoidance of generation of excessive waste, promotion of waste utilization and mitigation of adverse impacts of waste on human health and the environment, setting of legal basis for the regulation of waste management.

In 2012 new Mining Code was adopted to apply “one window” approach by simplifying exploitation provision process. Although the Code defines the principles of preservation and protection; however there are no major improvements in this area. The issue of waste did not receive adequate reflection in the mining code.

### 2.3 Country/Ministry/Municipality Environmental Capacity Analysis

Within the GOAM, targeted ministries include the Ministry of Social Affairs and Labor, Ministry of Territorial Administration, the Ministry of Health, Ministry of Justice, Ministry of Energy and Natural Resources and Ministry of Nature Protection, and relevant institutions for accountability and transparency. Within civil society, USAID anticipates that CSOs and media institutions which worked around reform areas will sustain project outcomes.
Due to lack of capacity and staffing constraints at the Ministerial level, in many cases decisions not well-informed and fail to take into account civil society concerns and recommendations.

The responsible institutions often have insufficient capacity to implement modern environmental compliance and monitoring approaches.

Larger communities maintain the in-house capacity to oversee compliance with environmental regulations during the implementation of projects involving infrastructure, as well as waste collection and administration and other type of services connected with environment. Typically, special staff is assigned to review the process and provide analytical status reports. If violations occur, the municipality should then take corrective action.

Due to small size and limited staff capacity, smaller communities/villages assign this role to the mayor who has to make sure that community services and projects are carried out in accordance with environmental regulations.

Municipalities with larger budgets occasionally outsource environmental analysis to engineering companies, which, along with construction services, maintain experts specializing in environmental regulations.

The Ministry of Territorial Administration has committed to recruit staff and create units to conduct environmental impact analysis.

In sum, in-house expert capacity at both at national and local levels is underdeveloped.

2.4 Sustainability Analysis [When applicable, including if it is a PAD IEE, discuss how the project has analyzed environmental aspects of sustainability]

The project will pursue compliance to legislation on proper waste management wherever applicable. In addition, it will strictly follow all the required environmental, health and safety safeguards for small-scale rehabilitation. This will promote environmental compliance and responsibility among implementing partners and local stakeholders and mitigate risks related to construction.

A number of activities under the Project may help address the root threats of lack of public education and awareness and lack of political will about biodiversity conservation matters, especially increasing the participation and voice of local NGOs and affected public, and local governments.

- Civil society consortia under the Advanced Civil Society for Accountable Governance Program will enhance environmental advocacy skills of selected number of civil society organizations and foster public access to environmental information, and participation in environmental decision making. This may entail training to target environmental NGOs that have the potential to serve as advocates for community interests and strengthen capacity in advocacy, management, and fundraising. The activity may conduct biodiversity awareness raising campaign for Armenia’s PA system to help raise awareness about the biodiversity heritage of the country, and its revenue generating potential.
• Activities targeting decentralization reform should consider working with municipalities, communities and civil society to raise awareness on environmental issues. The project may rationalize roles and responsibilities of national and local governments in supervision, management, and use of biodiversity resources. Further strengthening of local government, along with activities to improve financing, increase transparency and greater citizen participation, must consider to improve environmental compliance capacities of local governments, including development of municipal environmental programs, ability to review environmental impacts of local activities and monitor respective mitigation measures to minimize impact on biodiversity, and broader environment.

• The Media for Informed Civic Engagement aimed at increasing citizen access to independent and reliable information will consider training of journalists to improve their understanding of nature conservation issues, as well as rights and responsibilities of different actors in protection of environment.

• Activities aimed at Transparency and Accountability reform may help to address corruption in environmental compliance area supporting protection of biodiversity, as well as help establish systems and mechanisms (e.g. a mining registry) improving transparency of environmental data.

• The Livelihood Improvement through Fostered Employment for People with Disabilities Project’s goal is to develop an effective model for provision of employment services to People with Disabilities (PWD) through: Increasing availability and access of PWDs to coherent set of services; improving capacity of and quality of educational and employment services for PWDs and, increasing public awareness on access to employment and employment rights of PWDs. The project may consider improving environmental education and access to information about biodiversity, including awareness and access to biodiversity conservation and environmental protections jobs.

• Civil Society and Local Governance Support Project’s objectives are to increase the level of informed and organized civic activism at the local and national levels, and strengthen local governments through participatory, decentralized, and accountable governance. The project and the follow-up activities will enhance environmental advocacy skills of selected number of civil society organizations and by supporting public access to environmental information, and participation in environmental decision making.

• The Alternative Resources in Media activity pursues an integrated approach to promote media pluralism and enhance access to independent and quality news sources. The project addresses these objectives by supporting traditional and alternative media to embrace new communication technologies and to bring civic demand for alternative content. The ARM project supports citizen reporting from environmental hotspots in Armenia, including PAs and economic activities impacting biodiversity.

Government services and the mechanisms put in place for participation and oversight will be financially sustained through taxes and a better use of resources. The pension system will be revamped in accordance with a sustainable model which will ensure pensions in the future. Likewise, decentralization is projected to reduce costs over the long term.
The financial viability of CSOs after the project is a challenge. However, the design team has integrated a number of measures to improve the financial sustainability of their role under the project. These include: support for CSOs to work together to improve the enabling environment, specifically in amending the NGO Law to provide means for revenue generation; conditionality on amendments within the DOAG that would benefit CSOs’ financial viability; increasing CSOs’ constituency base; and strengthening CSOs’ ability to work productively with the government in pursuing objectives and thereby increasing their legitimacy among the public and government.

2.5 Climate Change Vulnerability Analysis

[When applicable, including if it is a PAD IEE, discuss how the project has analyzed climate change vulnerability]

N/A

3. Analysis of Potential Environmental Impact

Component 1: Increased civic engagement in and oversight of reforms improved and sustained

<table>
<thead>
<tr>
<th>Defined/Illustrative Activities</th>
<th>Nature of assistance</th>
<th>Potential Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Support CSO Consortia in three policy areas</td>
<td>Technical assistance, training</td>
<td>No adverse impact anticipated</td>
</tr>
<tr>
<td>1.2 Strengthen Media’s Accessibility, Reliability and Independence</td>
<td>Technical assistance, training</td>
<td>No adverse impact anticipated</td>
</tr>
<tr>
<td>1.3 Expand and Equip Pool of Technically and Organizationally Strong Local Partners (DGP)</td>
<td>Technical assistance, training</td>
<td>No adverse impact anticipated</td>
</tr>
<tr>
<td>1.4 Support Peace Corps Small Project Assistance Program (SPA)</td>
<td>Technical assistance, training, small-scale development grants</td>
<td>No adverse impact anticipated / Negative Determination with Conditions</td>
</tr>
</tbody>
</table>

Component 2: More open and responsive policymaking and implementation
<table>
<thead>
<tr>
<th>Defined/Illustrative Activities</th>
<th>Nature of assistance</th>
<th>Potential Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Support Decentralization.</td>
<td>Infrastructure rehabilitation and modernization of municipal buildings.</td>
<td>Negative Determination with Conditions</td>
</tr>
<tr>
<td>2.2 Support GOAM/MLSA in the implementation of the model of Integrated Social Services (one-stop-shop for social services).</td>
<td>Technical assistance, training</td>
<td>No adverse impact anticipated</td>
</tr>
<tr>
<td>2.3 Assist Pension System Awareness Center Foundation to enhance the established institutional system of delivering general financial literacy, public awareness, and customer response and support mechanism in Armenia pension system.</td>
<td>Technical assistance, training</td>
<td>No adverse impact anticipated</td>
</tr>
<tr>
<td>2.4 Promote equal employment opportunities and access to employment for people with disabilities</td>
<td>Technical assistance, training</td>
<td>No adverse impact anticipated</td>
</tr>
<tr>
<td>2.5 Support the GOAM’s national child welfare reform</td>
<td>Technical assistance, training, small-scale renovation</td>
<td>Potential impact to land, water, air.</td>
</tr>
<tr>
<td>2.6 Support Good Governance and GOAM’s Commitments to Transparency and Anti-Corruption</td>
<td>Technical assistance, training</td>
<td>No adverse impact anticipated</td>
</tr>
<tr>
<td>2.7 Support the Ministry of Justice to Implement One-Stop-Shops for Services</td>
<td>Technical assistance, training</td>
<td>No adverse impact anticipated</td>
</tr>
<tr>
<td>2.8 Support the Ministry of Energy and Natural Resources and Environment to Establish Digitized Database of Mineral Deposits</td>
<td>Technical assistance, training</td>
<td>No adverse impact anticipated</td>
</tr>
</tbody>
</table>
4. **Recommended Environmental Actions**

4.1 **Recommended Mitigation Measures and Threshold Determination**

<table>
<thead>
<tr>
<th>Defined/Illustrative Activities</th>
<th>Potential Impacts</th>
<th>Mitigation Measures</th>
<th>Recommended Threshold Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Component 1: Increased civic engagement in and oversight of reforms improved and sustained.</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1 Support CSO Consortiums in three policy areas</td>
<td>No adverse impact anticipated</td>
<td>N/A</td>
<td>Categorical exclusion</td>
</tr>
<tr>
<td>1.2 Strengthen Media’s accessibility, reliability and independence.</td>
<td>No adverse impact anticipated</td>
<td>N/A</td>
<td>Categorical exclusion</td>
</tr>
<tr>
<td>1.3 Expand and equip pool of technically and organizationally strong local partners (DGP)</td>
<td>No adverse impact anticipated</td>
<td>N/A</td>
<td>Categorical exclusion</td>
</tr>
</tbody>
</table>
| 1.4 Support Peace Corps Small Project Assistance Program (SPA) | The project may include minor infrastructure rehabilitation activities | - Prior to any new activities at a specific site, the EMMPs (Attachment 1 and 2) shall be reviewed by the implementer for suitability, adequacy, and comprehensive inclusion of necessary environmental, health and safety safeguards.  
- Progress on EMMP Implementation must be reported in monitoring, quarterly, and annual reports. | Negative Determination with Conditions |

Armenia / DO 2 PAD
## Component 2: More open and responsive policymaking and implementation

| 2.1 Support Decentralization. | The assistance will target the consolidated communities at the pilot stage. This may involve capital development project for the newly clustered communities, including infrastructure rehabilitation and modernization of municipal buildings. | - Prior to any new activities at a specific site, the EMMPs (Attachment 1 and 2) shall be reviewed by the implementer for suitability, adequacy, and comprehensive inclusion of necessary environmental, health and safety safeguards.  
- In case of a bilateral agreement and G2G support in support of decentralization, USAID/Armenia will provide the necessary support to get the counterparts up to speed to do EMMPs.  
- Progress on EMMP Implementation must be reported in monitoring, quarterly, and annual reports.  
-Attachment 3 will be used to verify Certification of No adverse impact. | Negative Determination with Conditions |

<p>| 2.2 Support GOAM/MLSA in the implementation of the model of Integrated Social Services (one-stop-shop for social services). | No adverse impact anticipated | N/A | Categorical exclusion |</p>
<table>
<thead>
<tr>
<th>Description</th>
<th>Impact</th>
<th>Category</th>
<th>Decision</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.3 Assist Pension System Awareness Center Foundation to enhance the</td>
<td>No adverse impact anticipated</td>
<td>N/A</td>
<td>Categorical</td>
</tr>
<tr>
<td>established institutional system of delivering general financial literacy,</td>
<td></td>
<td></td>
<td>exclusion</td>
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<tr>
<td>public awareness, and customer response and support mechanism in</td>
<td></td>
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<tr>
<td>Armenia pension system.</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>2.4 Promote equal employment opportunities and access to employment for</td>
<td>No adverse impact anticipated</td>
<td>N/A</td>
<td>Categorical</td>
</tr>
<tr>
<td>people with disabilities</td>
<td></td>
<td></td>
<td>exclusion</td>
</tr>
</tbody>
</table>
2.5 Support the GOAM’s national child welfare reform

Small-scale renovations within the transformation of residential child care institutions as well as infrastructure adjustments at mainstream schools. Disturbance of asbestos containing materials (ACM) (roof, pipes) may be hazardous to the health of workers and occupants – appropriate safe guards must be taken. No ACM are permitted to be used under USAID financed activities, although current structures may have ACM. Sewer system repair, rehabilitation or cleaning may lead to problems in disposing of excavated material and sludge. Heating system rehabilitation may present problems in disposal of replaced equipment and materials to improper disposal of excavated materials, pits which cause environmental damage and erosion, potential impact to land, water, air, and human health.

- Prior to any new activities at a specific site, the EMMPs (Attachment 1 and 2) shall be reviewed by the implementer for suitability, adequacy, and comprehensive inclusion of necessary environmental, health and safety safeguards.

- Progress on EMMP implementation must be reported in monitoring, quarterly, and annual reports.

- Attachment 3 will be used to verify Certification of No adverse impact.

A negative determination with conditions pursuant to 216.3(a)(2)(iii) is recommended for small-scale renovations within the transformation of residential child care institutions as well as infrastructure adjustments at mainstream schools to incorporate appropriate health and safety measures, waste disposal, and source material selection (based on best available and should consider energy efficiency performance as a critical factor).
<table>
<thead>
<tr>
<th>Description</th>
<th>Impact Expected</th>
<th>N/A</th>
<th>Decision</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.6 Support good governance and GOAM’s commitments to transparency and anti-corruption</td>
<td>No adverse impact anticipated</td>
<td>N/A</td>
<td>Categorical exclusion</td>
</tr>
<tr>
<td>2.7 Support the Ministry of Justice to Implement One-Stop-Shops for Services</td>
<td>No adverse impact anticipated</td>
<td>N/A</td>
<td>Categorical exclusion</td>
</tr>
<tr>
<td>2.8 Support the Ministry of Energy and Environment to Establish Digitized Database of Mineral Deposits</td>
<td>No adverse impact anticipated</td>
<td>N/A</td>
<td>Categorical exclusion</td>
</tr>
</tbody>
</table>
4.2 Recommended Environmental Determination:

**Categorical Exclusions:**
A categorical exclusion is recommended for the following identified activities under 22 CFR 216.2(c)(2):

- Activities 1.1, 1.2, 1.3, 2.2, 2.3, 2.4, 2.6, 2.7, 2.8, under §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.);

**Negative Determination with Conditions:**
- Under §216.3(a)(2)(iii), a negative determination with conditions is recommended for activities 1.4, 2.1 and 2.5.

Specific terms and conditions are presented below in Section 4.3.

4.3 Terms and Conditions:

4.3.1 Generally appropriate EMMPs have been developed and are attached (see Attachments 1 and 2). Prior to any new activities at a specific site, the attached EMMPs shall be reviewed by the Implementing Partner (IP) for suitability, adequacy, and comprehensive inclusion of necessary environmental, health and safety safeguards. When necessary, a revised EMMP shall be sent to the Contract Officer’s Representative (COR)/Agreement Officer’s Representative (AOR), prior to the start of work. For each site-specific activity, the EMMP attached to this IEE, or (the revised version, if appropriate) shall be attached to the signed Certification of No Adverse or Significant Effects on the Environment (See Attachment 3) and sent by the implementer to the COR/AOR for his or her records and copied to the Mission Environmental Officer (MEO) and Europe and Eurasia Bureau Environmental Officer (BEO).

4.3.2 EMMPs shall be captured in annual work plans, and therefore budgeted for and reviewed for adequacy at least annually.

4.3.3 Changes in activities, and their associated EMMPs shall necessitate amending the IEE or issuing a Memo to the File (depending on extent and potential impact of the changes)

4.4 USAID Monitoring and Reporting:

4.4.1 The AOR/COR, with the support of the MEO, is responsible for monitoring compliance of activities by means of desktop reviews and site visits.

4.4.2 If at any time the project is found to be out of compliance with the IEE, the AOR/COR or MEO shall immediately notify the BEO.

4.4.3 A summary report of Mission’s compliance relative to this IEE shall be sent to the BEO on an annual basis, normally in connection with...
preparation of the Mission’s annual environmental compliance report required under ADS 203.3.8.5 and 204.3.3.

4.4.4 The BEO or his/her designated representative may conduct site visits or request additional information for compliance monitoring purposes to ensure compliance with this IEE, as necessary.

4.5 Implementing Partner (IP) Monitoring and reporting

4.5.1 If an individual activity is found to pose significant adverse environmental effects that have not been identified and addressed in the EMMP(s) (Attachments 1 and 2), or EMMPs that were subsequently approved for the project, new EMMPs shall be developed to include environmental safeguards for such effects.

4.5.2 IPs shall report on environmental compliance requirements as part of their routine project reporting to USAID.

5. Mandatory Inclusion of Requirements in Solicitations, Awards, Budgets and Workplans

5.1 Appropriate environmental compliance language, including limitations defined in Section 6, shall be incorporated into solicitations and awards for this activity and projects budgets shall provide for adequate funding and human resources to comply with requirements of this IEE.

5.2 Solicitations shall include Statements of Work with task(s) for meeting environmental compliance requirements and appropriate evaluation criteria.

5.3 Environmental mitigation and monitoring requirements, when available, shall also be included in solicitations and awards.

5.4 The IP shall incorporate conditions set forth in this IEE into their annual work plans.

5.5 The IP shall ensure annual work plans do not prescribe activities that are defined as limitations, as defined in Section 6.

5.6 The USAID Mission will include an indicator for environmental compliance as part of the project’s performance monitoring plan.

6. Limitations of the IEE: This IEE does not cover activities (and therefore should changes in scope implicate any of the issues/activities listed below, a BEO-approved amendment shall be required), that:

6.1 Normally have a significant effect on the environment under §216.2(d)(1) [See http://www.usaid.gov/our_work/environment/compliance/regulations.html]

6.2 Support project preparation, project feasibility studies, engineering design for activities listed in §216.2(d)(1);

6.3 Affect endangered species;

6.4 Result in wetland or biodiversity degradation or loss;
6.5 Support extractive industries (e.g. mining and quarrying);
6.6 Promote timber harvesting;
6.7 Provide support for regulatory permitting;
6.8 Result in privatization of industrial or infrastructure facilities;
6.9 Lead to new construction of buildings or other structures;
6.10 Assist the procurement (including payment in kind, donations, guarantees of credit) or use (including handling, transport, fuel for transport, storage, mixing, loading, application, cleanup of spray equipment, and disposal) of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials and/or pesticides (cover all insecticides, fungicides, rodenticides, etc. covered under the Federal Insecticide, Fungicide, and Rodenticide Act); and
6.11 Procure or use genetically modified organisms.

7. Revisions
Under §216.3(a)(9), if new information becomes available that indicates that activities covered by the IEE might be considered major and their effect significant, or if additional activities are proposed that might be considered major and their adverse effect significant, this environmental threshold decision will be reviewed and, if necessary, revised by the Mission with concurrence by the BEO. It is the responsibility of the USAID COR/AOR to keep the MEO and BEO informed of any new information or changes in the activity that might require revision of this IEE.
8. Recommended Environmental Threshold Decision Clearances:

**Approval:**
Karen Hilliard, Mission Director

**Clearance:**
Marina Vardanyan, Mission Environmental Officer

**Clearance:**
Raymond Morton, Acting Director, DHSRO

**Concurrence:**
William Gibson
E&E Bureau Environmental Officer (acting)

**Distribution:**
IEE File
MEO (to also provide a copy to AOR/COR)
Example Building Rehabilitation Environmental Mitigation and Monitoring Plan Applicable for Existing Facilities with No New Construction and No Asbestos but Involving Delivery of Water and Wastewater Services

<table>
<thead>
<tr>
<th>Activity</th>
<th>Identified Environmental Impacts</th>
<th>Mitigation Measure(s)</th>
<th>Monitoring Indicator(s)</th>
<th>Monitoring &amp; Reporting Frequency</th>
<th>Responsible Party</th>
</tr>
</thead>
</table>
| 1) Building rehabilitation 2) Delivery of water & wastewater services | Unsafe Water Provided Surface & Groundwater Contamination (Soil Contamination) | • Provide clean water for drinking, hand washing & other building needs by:  
  **A)** Doing initial surface/groundwater quality and quantity testing  
  **B)** Using proper groundwater drilling methods (if applicable)  
  **C)** Doing ongoing periodic water quality testing  
  **D)** Employing signs & training to conserve clean water  
  • Install wastewater treatment where needed, e.g.,:  
  **A)** Septic Tanks: Use for domestic sewage; include maintenance/cleaning requirements & install drain fields  
  **B)** Protect drain fields, keep children out  
  • Minimize local impacts from construction materials | • Quantity of water (m3), quality of clean water (pathogens, other biologic & chemical parameters)  
  • Water use/discharge permit obtained (if applicable)  
  • Complaints from users & nearby residents | At project initiation & then monthly or quarterly | Implementer, Requirement shall be specified in contract/grant/loan agreements |
| Solid waste management (Soil & Groundwater Contamination) | Collect/segregate solid waste, reuse or dispose according to local regulations (in suitable landfills, if available)  
  • Solid waste management plan developed prior to starting activity/operation | • Types of solid waste & waste quantity (kg (m3))  
  • Record review & | | | Implementer |
<table>
<thead>
<tr>
<th>Activity</th>
<th>Identified Environmental Impacts</th>
<th>Mitigation Measure(s)</th>
<th>Monitoring Indicator(s)</th>
<th>Monitoring &amp; Reporting Frequency</th>
<th>Responsible Party</th>
</tr>
</thead>
</table>
| Air Pollution Impacts | | include as appropriate proper management of hazardous materials (especially asbestos* & previously stored hazardous items), used or excess supplies or consumables, used batteries, used oils, used fluorescent tubes, hazardous material containers, etc.  
  • Plan should include adequate employee training on waste management | | site inspections  
  • Complaints from nearby residents  
  • Records of required waste permits | | Implementer |
| Noise, Traffic Congestion, Odor, & Visual | | • Use low emissions & energy efficient windows & building materials, high efficiency lighting, low emission burners in boilers  
  • Use environmentally acceptable fuels for heating equipment  
  • Replace high greenhouse gas emissions fuels (e.g., coal) with cleaner fuels like natural gas, if possible  
  • Use best available technology for minimizing use/release of ozone depleting substances (ODS)  
  • Use best practices to avoid airborne asbestos particles* | | Concentration of relevant pollutants (mg/m³)  
  • Complaints from nearby residents  
  • Amounts & dates of ODS recovery  
  • Up-to-date certification of ODS handlers | At project initiation & then monthly or quarterly | Implementer |

* See EMMP for Asbestos Remediation
<table>
<thead>
<tr>
<th>Activity</th>
<th>Identified Environmental Impacts</th>
<th>Mitigation Measure(s)</th>
<th>Monitoring Indicator(s)</th>
<th>Monitoring &amp; Reporting Frequency</th>
<th>Responsible Party</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quality Impacts</td>
<td></td>
<td>equipment</td>
<td>residents</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Socioeconomic Impacts</td>
<td></td>
<td>• Avoid discharges to sensitive ecosystems • Minimize visible smoke &amp; boiler air emissions • Hire local workers • Community public meetings to share mitigation information • Obtain required building alteration permits</td>
<td>• Visual • Number of trained workers • Number of public meetings • Records of required permits</td>
<td>At project initiation &amp; then quarterly</td>
<td>Implementer</td>
</tr>
<tr>
<td>Occupational &amp; Public Health &amp; Safety Impacts</td>
<td></td>
<td>• Establish documented occupation safety procedures &amp; provide regular safety training • Provide workers with protective equipment (e.g., gloves, boots, eyeware) • Adopt fire precautions (e.g., working fire protection equipment, ban on smoking) • Manage construction traffic to protect children &amp; the community • Signs clearly displayed</td>
<td>• Inspection of fire protection equipment • Number of accidents &amp; injuries • Audits safety procedure/trainin g conformance</td>
<td>At project initiation &amp; then quarterly</td>
<td>Implementer</td>
</tr>
<tr>
<td>Resource depletion &amp; indirect impacts from energy &amp; water use</td>
<td></td>
<td>• Use high efficiency heating, cooling, &amp; lighting systems &amp; perform regular maintenance to optimize performance • Implement water conservation &amp; re-use measures whenever appropriate • Use environmentally preferable building</td>
<td>• Plans &amp; specifications that address resource depletion reduction for</td>
<td>At project initiation &amp; then quarterly</td>
<td>Implementer</td>
</tr>
<tr>
<td>Activity</td>
<td>Identified Environmental Impacts</td>
<td>Mitigation Measure(s)</td>
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<tr>
<td></td>
<td></td>
<td>materials</td>
<td>retrofits</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Environmental Mitigation and Monitoring Plan for Support for rehabilitation of existing facilities with Asbestos Remediation (no new construction) involving any or all of the following:

- Asbestos Containing Matter (ACM)
- Asbestos-tiled Roofs
- Asbestos with Corrugated Sheetmetal Plates
- Asbestos Insulation

<table>
<thead>
<tr>
<th>Activity</th>
<th>Identified Environmental Impacts</th>
<th>Mitigation Measure(s)</th>
<th>Monitoring Indicator(s)</th>
<th>Monitoring &amp; Reporting Frequency</th>
<th>Responsible Party</th>
</tr>
</thead>
</table>
| 1) Asbestos Containing Material | Preparing for Asbestos Removal Asbestos Contamination | • Preparing for asbestos removal. Considerations:  
**A)** Spray amended water (1:200 soap-to-water) to keep asbestos containing material (ACM) damp, but not saturated  
**B)** Place ACM in disposal bags, do not allow to accumulate on floor  
**C)** Use HEPA vacuums & damp cloth wiping to stop fiber migration or fibers becoming airborne, do not use dry sweeping  
**D)** Use 6 mil polyethylene sheeting as barriers for doors, windows, vents, ACM breakage/cutting | • Inspections  
• Amounts of ACM (kg)  
• ACM removal permit (if applicable)  
• Complaints from nearby residents | Daily or Weekly | Implementer, Requirements shall be specified in contract/grant/loan agreements |
| 2) Asbestos-tiled Roofs |  |  |  |  |  |
| 3) Asbestos with Corrugated Sheetmetal Plates |  |  |  |  |  |
| 4) Asbestos Insulation | Asbestos Contamination During Removal | • Asbestos removal procedures.  
**A)** Removal of ACM panels intact, if possible and place in disposal bags  
**B)** Removal of ACM screwed-in panels after wetting screw heads. Clean holes with damp (amended water) cloth  
**C)** Removal of ACM riveted panels. (Describe expected rivet removal steps). Minimize breakage, use amended water  
• Place ACM & disposable overalls in 6-mil | • Inspections  
• Amount of ACM (kg)  
• Inspections  
• Complaints from nearby residents | Daily or Weekly | Implementer |

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**Preparing for Asbestos Removal Asbestos Contamination**

- Considerations:
  - **A)** Spray amended water (1:200 soap-to-water) to keep asbestos containing material (ACM) damp, but not saturated
  - **B)** Place ACM in disposal bags, do not allow to accumulate on floor
  - **C)** Use HEPA vacuums & damp cloth wiping to stop fiber migration or fibers becoming airborne, do not use dry sweeping
  - **D)** Use 6 mil polyethylene sheeting as barriers for doors, windows, vents, ACM breakage/cutting
<table>
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<tr>
<th>Activity</th>
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</tr>
</thead>
<tbody>
<tr>
<td>ACM Disposal</td>
<td>• Transport waste ACM &amp; bags of contaminated clothing to disposal site in a covered truck.</td>
<td>• Transport waste ACM &amp; bags of contaminated clothing to disposal site in a covered truck. • Excavate special place in landfill, build wooded encasement structure, and bury 1 meter underground • Mark site with permanent warning sign</td>
<td>• Inspections • Amount of ACM (kg) • Complaints from nearby residents • Final ACM removal &amp; disposal report (details of what was done, any problems or unexpected exposures, lessons learned)</td>
<td>Daily/Weekly</td>
<td>Implementer</td>
</tr>
<tr>
<td>Socioeconomic Impacts</td>
<td>• Protect ecosystems in/ near facilities with asbestos</td>
<td>• Protect ecosystems in/ near facilities with asbestos • Public meetings with community to share information on asbestos removal, handling &amp; disposal • Avoid asbestos disposal near sensitive ecosystems • Hire local workers • Community public meetings to share mitigation information</td>
<td>• Inspections. • Number of public meetings</td>
<td>Weekly</td>
<td>Implementer</td>
</tr>
<tr>
<td>Activity</td>
<td>Identified Environmental Impacts</td>
<td>Mitigation Measure(s)</td>
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<td>Public Health &amp; Safety</td>
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<td>• Close access to facility during demolition, asbestos removal &amp; transportation for disposal</td>
<td>• Inspection to insure safety equipment is used IAW manufacturer specifications</td>
<td>Daily or Weekly</td>
<td>Implementer</td>
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<td>• Written asbestos safety procedures for workers &amp; the public</td>
<td>• Number of accidents &amp; injuries</td>
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<td>• Provide workers with protective equipment</td>
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<td>• (e.g., Respirators (negative pressure, P100 equivalent particulate filter, half-face or full-face), gloves, disposable overalls)</td>
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<td>• Decontamination washing facility to wash workers from head to toe</td>
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<td>• Signs clearly displayed</td>
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CERTIFICATION OF NO ADVERSE OR SIGNIFICANT EFFECTS ON THE ENVIRONMENT

The undersigned certifies that all foreseeable adverse or significant effects on the environment have been adequately and effectively eliminated or mitigated in compliance with national protocols on proper handling, storage, use, and disposal of medical waste. If new adverse effects or the need for new or improved mitigation measures are identified, I will immediately notify the USAID activity manager/COR/AOR.

Implementer Project Director/COP: __________________________ Date: ______________

Received by COR/AOR: __________________________ Date: ______________