ENVIRONMENTAL THRESHOLD DECISION

Activity Location: Latin America and the Caribbean (LAC) Regional
Activity Title: Food Safety and Agricultural Sustainability Training (FAST) activity
Activity Number: TBD
Life-of-Activity Funding: $3 million
Life-of-Activity: FY 2014 - FY 2017
IEE prepared by: Kerry Byrnes LAC/RSD/BBEG
Savannah ThomasArrigo, LAC/RSD/PO
Reference Threshold Decision: None
Recommended Threshold Decision: Categorical Exclusion
Bureau Threshold Decision: Categorical Exclusion
Comments:

A Categorical Exclusion is issued to the Food Safety and Agricultural Sustainability Training (FAST) activity, pursuant to 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;

(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.);

Amendments

- Amendments to Initial Environmental Examinations (IEE) shall be submitted for LAC Bureau Environmental Officer (BEO) approval for any activities not specifically covered in the IEE, which include:
  - Funding level increase beyond ETD amount,
  - Time period extension beyond ETD dates (even for no cost extension), or
  - A change in the scope of work, such as the use of pesticides or activities subject to Foreign Assistance Act sections 118 and 119 (e.g. procurement of logging equipment), among others.

- Amendments to IEEs and Environmental Assessments (EAs) and approval of these documents by the LAC BEO could require an annual evaluation for environmental compliance.

Victor H. Bullen
Bureau Environmental Officer
Bureau for Latin America & the Caribbean

Date: 03-25-2014

Copy to:
Rose Rakas, LAC/RSD, Office Director
Tracy Quilter, LAC/RSD/BBEG
Doug Pulse, LAC/RSD/BBEG
Kerry Byrnes, LAC/RSD/BBEG
Savannah Thomas Ariego, LAC/RSD

Copy to:
Joe Torres (REA/CAR), Paul Schmidtke (REA CAM), Jason Girard (REA SA),
Adriana Hayes, LAC/OLA, Jene Thomas,
LAC/CAR, LAC

Copy to:
IEE File

Attachment: Initial Environmental Examination

File: P:\LAC.RSD.PUB\RSDPUB\ENV\Reg 216\IEE\IEE14\ LAC-IEE-14-21 CE (LAC – Food Safety Ag Sustainability Training, FAST).doc
**INITIAL ENVIRONMENTAL EXAMINATION**

<table>
<thead>
<tr>
<th>Activity Location:</th>
<th>LAC Regional (activity will work in USAID-assisted countries in the LAC region, as detailed below)</th>
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1. Background and activity/program description

1.1 Purpose and Scope of IEE
Pursuant to 22 CFR 216.2(a), environmental analysis/evaluation is required for new projects, programs, or activities authorized by USAID. The purpose of this IEE is to determine the potential environmental impacts associated with the USAID/LAC/RSD Food Safety and Agricultural Sustainability Training (FAST) activity. This activity will be active from FY 2014 – FY 2017, with an anticipated total estimated cost of $3 million. The activity will assist LAC countries in readying their value chains that export food to the United States to comply with the food safety requirements of the Food Safety Modernization Act (FSMA).

1.2 Background
To assist those countries in readying their food-exporting value chains to comply with the food safety requirements of FSMA, LAC/RSD proposes the FAST activity to build LAC regional and national-level capacity to provide training and technical assistance on food safety and FSMA to value chain stakeholders exporting food to the United States.

The proposed activity will be implemented in two phases: Phase 1 will focus on raising awareness, knowledge, and understanding of the basic technical requirements for food safety that FSMA is expected to emphasize. Building the capacity of regional and selected national-level organizations to provide training and technical assistance to food-exporting value chains on food safety and the functional issues that FSMA’s regulations likely will require. Once the Food and Drug Administration (FDA) issues the FSMA regulations, Phase 2 will work with regional and national-level organizations trained during Phase 1 to organize and deliver country-specific capacity building, training, and technical assistance on FSMA for enterprises that produce, harvest, post-harvest handle, process, or pack food products for export to the United States. A more detailed explanation of the phases is below.

FAST will be implemented under a single project management unit at the U.S. Department of Agriculture (USDA), which will coordinate with stakeholders, other partners, and/or subgrantees to deliver food safety and FSMA-related training and technical assistance.

1.3 Geographic focus/locations affected
The beneficiary countries for FAST assistance are those 13 USAID-assisted countries that: (a) have signed a free trade agreement (FTA) with the United States (Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Mexico, Nicaragua, and Peru; (b) have preferential one-way access to the U.S. market (Barbados/Eastern Caribbean, Haiti, and Jamaica); or (c) have USAID presence and export agricultural goods to the U.S. market (Brazil and Paraguay). In all cases, FAST will target regional and national public and private sector organizations that provide technical assistance and training to small- and medium-scale farms.

LAC/RSD is mindful of Missions’ important relationships with government counterparts and other in-country stakeholders. LAC/RSD will work closely with Missions to ensure that FAST regional training and technical assistance is coordinated with USAID’s field Missions in the LAC region.
I.4 Description of activities
The activity will have two main phases under one primary implementing mechanism:

Phase 1 - Technical assistance and “train-the-trainer” assistance during this phase will focus on building a network of intermediary organizations, and their capacity, to provide implementation-related technical assistance and training on FSMA once the FDA issues the regulations and timetable for implementing FSMA. As signatories to the World Trade Organization (WTO) Agreement on Sanitary and Phytosanitary (SPS) Measures and, in many cases, a free trade agreement (FTA) with the United States, countries have a basic understanding of food safety-related components included in those agreements. However, under FSMA, the U.S. is putting in place new rules with which exporting countries must comply. These rules are to be finalized by various target dates in 2015 and 2016, with the initial rollout of FSMA (for some regulations) to be implemented in 2015.

During this first phase, the activity will focus on organizing four regional “train-the-trainer” courses to raise awareness, knowledge, and understanding of (a) the increasing importance that food-exporting value chains ensure food safety; (b) FSMA’s pending implementation, potential implications for food-exporting value chains, and the resources available to stay abreast of FSMA; and (c) the basic conditions that agricultural value chains need to have in place in order to ensure food safety. Component (c) above will include a focus on the current causes of food rejections at the U.S. border and training on topics that can help countries prepare for the implementation of FSMA, such as Good Agricultural Practices (GAPs), implementing a Hazard Analysis and Critical Control Points (HACCP) system, and compliance with the WTO SPS Agreement measures.

A major focus and output of Phase 1 will be building a network of national-level contacts that the FAST activity can subsequently work with and through in organizing country-focused technical assistance and “train-the-trainer” courses during Phase 2.

Phase 2 – This phase will incorporate national-level intermediary stakeholder organizations, including export promotion organizations, producer associations, ministries of agriculture, donor-funded NGOs, academic institutions, and others, to build their capacity to provide technical support directly to producers in food-exporting value chains. The emphasis during this phase will be on raising awareness, knowledge, and understanding of FSMA’s requirements. For example, trainings may include information on advantages and disadvantages of potential traceability systems that could be adopted by buyers and exporters.

LAC/RSD/BBEG proposes implementing FAST through a 632(b) Inter-Agency Agreement (IAA) with the U.S. Department of Agriculture, Foreign Agricultural Service, Office of Capacity Building and Development (USDA/FAS/OCBD), including coordination with and potential sub-agreements with FDA, the Inter-American Institute for Cooperation in Agriculture (IICA), and universities and non-profits already developing food safety curricula that can be leveraged to support the implementation of FAST. USDA/FAS/OCBD will work with regional and national-level institutions in the LAC region to implement Phases 1 and 2.
For many years, USDA/FAS/OCBD has partnered with USAID to implement agricultural projects, including ongoing Sanitary and Phytosanitary (SPS) assistance in Central America under an agreement with USAID/ECAM. In addition, USDA will likely partner with IICA, which has an office in each USAID-assisted LAC country, to organize national-level training and technical assistance in partnership with national export support institutions (e.g., AGEXPORT in Guatemala).

1.5 **Illustrative activities and evaluation of environmental impact potential**

The specific mix of interventions will be coordinated with information and training materials already developed by implementing partners. These may include:

- Preparation, adaptation, and compilation of a range of print, audio, visual, and web-based educational materials to support dissemination of information on food safety, traceability, and FSMA by appropriate media and for use in “train-the-trainer” programs and training programs for small-scale farms and firms.
- Design and delivery of four regional “train-the-trainer” programs on FSMA and traceability, and at least one “train-the-trainer” program for each assisted country.
- Provision of technical assistance to help countries and food-exporting value chains assess preparedness for FSMA.
- Provision of technical assistance to help food-exporting value chains in evaluating and choosing an appropriate system to “trace” a problem shipment of food back to the specific farm or firm where that food item was grown, processed, and/or packaged.

These illustrative activities will not create direct, indirect, or cumulative impacts on the environment, as envisioned. Further, FAST training and technical assistance activities will be environmentally sensitive, emphasizing, for example, the way in which certain practices are harmful to human health and the environment.

2. **Recommended Threshold Decisions**

2.1 **Categorical Exclusion**

22 CFR 216.2 provides for the classification and determination of the potential environmental effects of USAID funded activities.

Section 216.2 (c) (2) provides for Categorical Exclusion for:

(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.);

(ii) Analyses, studies, academic or research workshops and meetings;

(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.).
The above Categorical Exclusions are recommended for the FAST activity, because the activity will focus on technical assistance, training of trainers, and building the capacity of public and private organizations related to the food safety regulations, and will have no impact on the environment.
FOOD SAFETY, AGRICULTURAL SUSTAINABILITY, AND TRACEABILITY (FAST)
ACTIVITY INITIAL ENVIRONMENTAL EXAMINATION CLEARANCE PAGE

Recommend Approval:

_________________________ Date: ____________________
Rose Rakas
Director, LAC/RSD
Bureau for Latin America and the Caribbean

Concurrence:

_________________________ Date: ____________________
Douglas Pulse
Acting Team Leader, Broad Based Economic Growth
LAC/RSD
Bureau for Latin America and the Caribbean

Recommend Approval:

_________________________ Date: ____________________
Rose Rakas
Director, LAC/RSD
Bureau for Latin America and the Caribbean

Concurrence:

_________________________ Date: ____________________
Douglas Pulse
Acting Team Leader, Broad Based Economic Growth
LAC/RSD
Bureau for Latin America and the Caribbean

Drafters:
SThomasArrigo, LAC/RSD/PO; KByrnes, LAC/RSD/BBEG

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Last edit 2/28/2014