AMENDMENT OF INITIAL ENVIRONMENTAL EXAMINATION & CATEGORICAL EXCLUSION
USAID/SOUTH SUDAN EDUCATION OFFICE

PROGRAM/ACTIVITY DATA:

Program/Activity Number:  PIO Grant No. AID-668-IO14-00001
Program Activity Title:  USAID Emergency Education Program
Country/Region:  South Sudan/East Africa
Implementing Organization:  UNICEF
Functional Objective:  Investing in People
Program Area:  3.2—Education
Program Elements:  3.2.1— Basic Education
LOP Amount:  $23,440,797

IEE Amendment Prepared By:  Anyieth Ayuen, Program Management Specialist
IEE Amendment (Y/N):  Y - If “yes”, date and number of original IEE: Emergency Education Program originally approved on May 7, 2014
Submitted By:  Program Management Specialist
Current Date:  May 21 2015
Expiration Date:  December 31, 2016

Additional References: N/A

ENVIRONMENTAL ACTION RECOMMENDED:

<table>
<thead>
<tr>
<th>Categorical Exclusion</th>
<th>X</th>
<th>Negative Determination</th>
<th>X</th>
</tr>
</thead>
<tbody>
<tr>
<td>Positive Determination</td>
<td></td>
<td>Deferral</td>
<td></td>
</tr>
</tbody>
</table>

ADDITIONAL ELEMENTS:

<table>
<thead>
<tr>
<th>EMMP: X</th>
<th>Conditions: X</th>
<th>PVO/NGO: X</th>
<th>Pesticides:*</th>
</tr>
</thead>
</table>

*22 CFR 216.3 (b)(1) applies

SUMMARY OF FINDINGS:

Purpose and Scope. The purpose of this amendment#1 to the Emergency Education Program IEE dated 5/7/2014 addresses activities under the USAID/South Sudan Emergency Education program with UNICEF to include an increase in the total estimated amount as well as address any subsequent increase in the life of project targets. The Total Estimate Amount will increase from $17,440,797 to $ 23,440,797. Subsequently, Life of project targets will change as follow: temporary learning spaces will increase from the original target of 300 to 470, number of learners reached will increase from 150,000 to 200,000, PTA members trained will increase from 700 to 850 and teachers trained will increase from 1,800 to 2,640. All other aspects of the program remain the same.

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In summary, activities under this Emergency Education Program are intended to provide children and youth affected by the current acute humanitarian crises in South Sudan with access to quality education in a protected environment.

RECOMMENDED THRESHOLD ENVIRONMENTAL DETERMINATIONS

All determinations remain the same. They are summarized as below.

**Recommended Determinations.** For the purpose of environmental review, activities are grouped into seven intervention categories. These categories are listed in the table below, with their entailed activities. The table summarizes the recommended determinations by category. For each, a link is provided to the activity descriptions, analysis of potential environmental impacts, determinations and, where relevant, conditions within Section 3 of the IEE. Upon approval of this IEE, Recommended Determinations are confirmed as 22 CFR 216 Threshold Decisions and conditions become required elements of implementation by UNICEF of the following activities:

- **Categorical Exclusions**, per 22 CFR 216.2 (c)(2)(i)- (iii) Analyses, studies, academic or research workshops and meetings; and (v) document and information transfers, are recommended for all activities encompassed by intervention categories 3-7 listed above.
- (iii) Activities involving analyses, studies, academic or research workshops and meetings;
- (v) Activities involving document and information transfers;

**Negative Determination with Conditions:**

A Negative Determination with Conditions is recommended pursuant to 22 CFR 216.3(a) (2) (iii) for activities dealing with Water, Sanitation and Health - WASH activities and establishing or rehabilitating Temporary Learning Space using local materials and/or tents

Table 1. Summary of Threshold Determinations

<table>
<thead>
<tr>
<th>Intervention Categories &amp; Entailed Activities</th>
<th>Categorical Exclusion(s)</th>
<th>Negative Determination(s) with conditions</th>
<th>Positive Determination(s)</th>
<th>Link to full analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Establish or rehabilitate safe and protective integrated temporary learning spaces by using local materials and tents</td>
<td></td>
<td></td>
<td></td>
<td>3.1 Small scale infrastructure</td>
</tr>
<tr>
<td>2. WASH Components. Establish WASH disaggregated facilities- latrines and hand-washing stations. Procure and distribute sanitary pads Establish boreholes Maintaining facilities operation</td>
<td></td>
<td></td>
<td></td>
<td>3.2 Water, Sanitation and Health - WASH activities</td>
</tr>
<tr>
<td>3. Supply teaching and learning materials;</td>
<td>☐</td>
<td>3.3 Supply of adequate and relevant teaching and learning materials</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Procure, preposition and distribute teaching and learning materials and Early Childhood Development (ECD)1 kits to ensure timely response.</td>
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</tr>
<tr>
<td></td>
<td>per 22 CFR 216.2 (c)(2)(i),(iii), (v), education, technical assistance or training/ analyses, studies, academic or research workshops and meetings/ document and information transfers</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| 4. Support for literacy and numeracy learning, life skills learning, psychological support for in and out-of-school children, adolescents and youth | ☐ | 3.4 Support for literacy and numeracy and life skills learning and psychological support for in and out-of-school children, adolescents and youth; |
| Provide psychosocial support in temporary learning spaces and communities | | |
| Train and equip 450 out of school adolescents/ youth with peer education skills | | |
| Establish and train student based Peace Clubs to monitor and report cases of violence in school. | | |
| Implement Early Childhood Development (ECD) in Emergencies | | |
| | per 22 CFR 216.2 (c)(2)(i),(iii), (v), education, technical assistance or training/ analyses, studies, academic or research workshops and meetings/ document and information transfers | |

| 5. Training of teachers in life skills, peace-building and psychosocial support | ☑ | 3.5 Training of teachers in life skills, peace-building and psychosocial support |
| Provide rapid teacher training/orientation on life skills, peace-building, and psychosocial support in collaboration with Child Protection. | | |
| Support the training of teachers, PTA members and communities on gender and the importance of girls’ education, ensuring schools are safe environments for children | | |
| | per 22 CFR 216.2 (c)(2)(i),(v), education, technical assistance or training/ document and information transfers | |

| 6. Advocacy and delivery of lifesaving messages, behavior change communications | ☐ | 3.6 Advocacy and delivery of lifesaving messages, and behavior change communications; |
| Advocate for the vacation of | | |
| | per 22 CFR 216.2 (c)(2)(i),(iii), (v), education, technical assistance or | |

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<table>
<thead>
<tr>
<th>schools occupied by armed forces and IDPs</th>
<th>training/ analyses, studies, academic or research workshops and meetings/ document and information transfers</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Use an evidence-informed Integrated Communication for Development (C4D) strategic process to promote positive and measurable behavior and social change intervention to create tolerance, positive relations among stakeholders, social cohesion and reinforce positive value of education.</td>
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<td></td>
</tr>
</tbody>
</table>

7. Administrative and logistics support, planning, assessments, coordination, monitoring and evaluation;

Participate in ongoing needs education assessments, develop response plans and undertake field monitoring/evaluation initiatives and circulate information to cluster partners.

Strengthen coordination mechanisms for education in emergencies in collaboration with government and education cluster partners to ensure timely and coordinated humanitarian response.

Provide technical support to programme implementation, monitoring and evaluation.

Provide administrative and cross-sectoral support (including transport, warehousing, logistical, security & field operations support

[Per 22 CFR 216.2 (c)(2)(i),(iii), (v), education, technical assistance or training/ analyses, studies, academic or research workshops and meetings/ document and information transfers](#)

3.7 Administrative and logistics support, planning, assessments, coordination, monitoring and evaluation.

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**General Implementation & Monitoring Conditions.**

In addition to the determinations enumerated in Section 3 below, general monitoring and implementation requirements are specified in Section 4 of the IEE. These require:

a) Implementing Partner (IP) briefings on environmental compliance responsibilities;
b) Development of Environmental Mitigation and Monitoring Plan (EMMP);
c) Integration and implementation of EMMP;
d) Integration of compliance responsibilities in prime and sub-contracts and grant agreements;
e) Assurance of sub-grantee and sub-contractor capacity and compliance;
f) Education team environmental compliance monitoring responsibilities;
g) 22 CFR 216 documentation coverage for new or modified activities; and
h) Compliance with host country requirements.

**Conditions:**
The conditions including the need to develop a WQUAPs are discussed on section 4.2 of the IEE.

**Application of USAID Environmental Procedures to PIO Awards (ADS 301.3.11)**

ADS 308.3.11 states that “USAID should strive to rely upon the PIO’s application of its own environmental policies to the activity proposed and include appropriate language in the PIO agreement. Any environmental conditions proposed to ensure adequate environmental review of the activity proposed should have due regard to both the independence and sovereignty of the PIO and the purpose and intent of the environmental impact assessment requirements of USAID.”

Therefore, should UNICEF determine that elements of the conditions enumerated in sections 3 or 4 of this IEE and summarized above are not compatible with UNICEF’s environmental policies and procedures, UNICEF may propose alternate environmental management commitments responsive to the potential adverse impacts identified in this IEE and the intent of the conditions established in sections 3 and 4. The Regional Environmental Advisor (REA) is authorized to approve these alternate commitments, without need for amendment of this IEE. Appropriate language should be included in the PIO agreement.
APPROVAL OF THE RECOMMENDED ENVIRONMENTAL ACTION:

Clearances:
Mission Director: Teresa McGhie, 
USAID/South Sudan

Concurrence:
Brian Hirsch, 
AFR Bureau Environmental Officer

Date 5/26/2015

Date 6/20/15
Recommended by:

Education Office Director: LeAnna Marr  Date 4/30/15
USAID/South Sudan

Program Officer: Michael Reilly  Date
USAID/South Sudan

Mission Environmental Officer: Richard Nyarsuk  Date 4/30/15
USAID/South Sudan

Regional Environmental Advisor: David Kinyua,  Date 5/21/15
USAID/East Africa

Resident Legal Officer:  Date 5/18/15
USAID/South Sudan

D/Mission Director: Alfreda Brewer  Date 5-22-15
USAID/South Sudan

Distribution List:
USAID/South Sudan Education Office
ACORs and Activity Managers
USAID/South Sudan Office of Acquisitions and Assistance
USAID/South Sudan Program Office
INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/ACTIVITY DATA:
Program/Activity Number: Cooperative Agreement No. AID-668-IO14-00001
Program Activity Title: USAID Emergency Education in South Sudan
Country/Region: South Sudan/East Africa
Functional Objective: Investing in People
Program Area: 3.2—Education
Program Elements: 3.2.1—Basic Education

1.0 Background and Program Description

1.1 PURPOSE AND SCOPE OF IEE
This amendment to the IEE addresses all activities under the USAID/South Sudan Education in Emergency PIO, implemented by UNICEF to include an increased life of project targets as a result of the planned increase in the total estimated amount. In summary, these activities are intended to provide children and youth affected by the current acute humanitarian crises in South Sudan with access to quality education in a protected environment. In accordance with 22 CFR 216, this IEE reviews the reasonably foreseeable effects of these activities on the environment, including human health. On this basis, this IEE recommends determinations for these activities and, as relevant attendant conditions. Upon final approval of this IEE, recommended determinations are affirmed as 22 CFR 216 Threshold Decisions and conditions become mandatory elements of project implementation.

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

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 PROGRAM BACKGROUND (CONTEXT & JUSTIFICATION)
The armed clashes that broke out on 15 December 2013 between different elements of the South Sudan armed forces has affected seven out of ten states in South Sudan leading to wide scale displacement of the population. Out of the estimated two million children of school-going age in 2014, it is estimated that more than half of them will be affected by the crises in the months to come. The situation is aggravating an already difficult education situation, with lower enrolments likely. Besides missing the opportunity to go to school, some children will be affected psychologically as they witness violence and conflict in the IDP sites as well as in the PoC sites within UNMISS Bases. Addressing the psychosocial needs of the affected children is both urgent and imperative.

The main goal of the education in emergency interventions to be pursued under this PIO are to ensure that girls, boys and youth affected by the crisis have access to quality education in a protective environment.

1.3 ACTIVITIES (INTERVENTION CATEGORIES)
For purposes of environmental review, activities to be undertaken are organized into the following intervention categories:
1. Establish or rehabilitate 470 safe and protective integrated temporary learning spaces, using local materials and/or tents, as indicated.
2. Provide appropriate water and sanitation for these learning spaces, including building latrines, provision of sanitary pads, establishing hand-washing facilities and drilling boreholes;
3. Supply of teaching and learning materials;
4. Support for literacy and numeracy learning, life skills learning, psychological support for in and out-of-school children, adolescents and youth;
5. Training of teachers in life skills, peace-building and psychosocial support;
6. Advocacy and delivery of lifesaving messages, behavior change communications;
7. Administrative and logistics support, planning, assessments, coordination, monitoring and evaluation;

The proposed interventions will benefit 200,000 children (77,000 girls and 103,000 boys), 2,640 teachers (825 female and 1,815 male), 150 social workers (40 female, 110 male), 200 CFS Facilitators (100 female, 100 male), 225 ECD facilitators (70 female and 155 male) and 850 PTA members (309 female and 541 male) with a focus on the hot spots of Jonglei, Unity, Upper Nile, Lakes, Eastern Equatoria and Central Equatoria.

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

2.1 COUNTRY INFORMATION

2.1.1 Population
South Sudan gained independence from Sudan on 9 July 2011, and is the world’s newest country. A 2008 census showed that the population of South Sudan was 8,260,490. However, this figure is hotly disputed because the census was conducted by the Sudanese Government of the time and is believed by many to have been manipulated for political reasons. The actual population of South Sudan is estimated to be between 10-12 million people.² Administratively, South Sudan is divided into 10 states: Central Equatoria, Eastern Equatoria, Jonglei, Lakes, Northern Bahr el Ghazal, Unity, Upper Nile, Warrap, Western Bahr el Ghazal, Western Equatoria³.

2.1.2 Physical Environment
South Sudan covers an area of about 640,000 square kilometers. It includes stretches of tropical and equatorial forests, wetlands (including the Sudd swamps), savannah and mountains. Vegetation in the South is characterized by Sudanian woodlands, with lowland forest patches along the border with the Democratic Republic of the Congo (DRC) and the Imatong Mountains. Around the White Nile are very extensive swamps and floodplains. The most important mountain forests in the Sudan are in the Imatong Mountains in the extreme south, including Didinga and Dongoton Mountains. South Sudan is entirely within the Nile River basin and shares borders with five countries (Ethiopia, Kenya, Uganda, Central African Republic, and Democratic Republic of the Congo).

Most of South Sudan has a semi-humid climate, with annual rainfall ranging from 200mm in the Southeast (Eastern Equatoria) to 1200-2200mm in the forest zone in Western Equatoria and the Equatorial highlands. In the Northern states rainfall varies between 700-1300mm. Rainfall is seasonal with the rainy season from April to December that causes seasonal flooding of floodplains. Temperatures

² http://worldpopulationreview.com/countries/south-sudan-population/

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in South Sudan are typically above 25°C and can rise above 35°C, particularly during the dry season, which lasts from January to April. The hot, dry conditions trigger seasonal human and livestock migration to more permanent water sources (the toic), which serve as dry season grazing pasture, and for some ethnic groups, such as the Dinka, they also serve as fishing grounds.4

South Sudan suffers from inadequate supplies of potable water, declining wildlife populations because of warfare and excessive hunting, soil erosion, desertification, and periodic droughts and floods. Environmental Impacts Risks and Opportunities Assessment for South Sudan conducted by UNDP and Ministry of Environment, Government of the Republic of South Sudan noted that among some of the most striking impacts relating to climate change and environmental degradation on water, soil and biodiversity observed was accelerating deforestation due to wood being collected for fuel, charcoal production, bricks and collection of construction materials and other uses. The assessment also noted that South Sudan has a number of opportunities, including low population density in relation to a significant wealth of basic primary resources such as abundant water, good soils, relatively high rainfall, and potentially good forest cover.5

2.1.3 MAP OF SOUTH SUDAN

![Map of South Sudan States](source:Wikemedia Commons)

2.2 SOUTH SUDAN EDUCATION SECTOR PROFILE

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Catterson et al, Programmatic Environmental Assessment of Road Rehabilitation Activities in Southern Sudan, first draft, 2006.
Walsh, USAID Initial Environmental Examination for Sudan SOs 9, 10, and 11, 2006.


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In the years of war much was destroyed. About 2.5 million people died, schools were burned down, teachers and students became freedom fighters or refugees, and teacher training institutes were forced to close. These historical legacies affected many aspect of life in South Sudan, including educational opportunities.

South Sudan faces new challenges in the aftermath of independence. Guided by its National South Sudan Development Plan (SSDP), the education sector has been engaged in development of an education sector strategy. The General Education Strategic Plan (GESP) for 2012-2017 lays out the foundation of an educational system. GESP provides the national context and describes the social and humanitarian challenges, and economic and educational challenges. It describes the current situation for education for South Sudan and outlines strategic direction. The Plan establishes seven strategic goals including: (1) to increase access to general education and to promote equity; (2) to improve the quality of general education; (3) to promote adult literacy; (4) to build institutional and human capacity; (5) to increase funding for general education to support implementation of the Action Plan; (6) to promote partnership working among stakeholders throughout the country; and (7) to monitor and evaluate implementation of the GESP.

Implementation of the GESP is carried out by the Ministry, State governments and Local governments. States already have the responsibility for primary and secondary education. There are three educational ministries, the Ministry of Education Science and Technology (MoEST), the Ministry of General Education and Instruction (MoGEI) and Ministry of Higher Education Science and Technology (MoHEST). MoGEI is responsible primarily for setting the policies and standards framework required for the delivery for education in the country, and for monitoring and evaluating the management of resources by the State Ministries of Education. 6

2.3 LOCATIONS AFFECTED
Interventions will be focused on the hot spots of Jonglei, Unity, Upper Nile, Lakes, Eastern Equatoria and Central Equatoria states.

2.4 SOUTH SUDAN ENVIRONMENTAL POLICIES AND PROCEDURES
South Sudan has five administrative levels namely, national level, state, county, payam and boma. Ministries are established at both national and state levels, below that the administrations have departments or units for the various sectors. The Ministry of Environment, Wildlife Conservation and Tourism (MEWCT) is responsible for the development and implementation of environmental policy and legislation.

The Ministry of Environment responsibilities include: developing and implementing policies on environmental protection and conservation; establish the Government’s environmental policy and monitor its effectiveness and impact; create programs in collaboration with other Ministries for the control of environmental degradation and control of desertification; develop Environmental Impact Assessment standard methodologies and procedures for government development policies and private sector investment; advice and support State and Local governments in their responsibilities for environment and build their capacity to assume all functions vested by the Constitution and government policy. At the level of the States and Local governments, the environmental policy has not yet been shaped. Only a few states have environmental directorates attached to one of their Ministries.

The South Sudan National Environmental Policy has been drafted in 2010. The arrangements required for the implementation of Environmental Policy are elaborated in the Environmental Protection Bill 2010.

The Bill established the South Sudan National Environmental Authority, articulated arrangements for the integration and mainstreaming of the environmental policy in line ministries and lower level governments through Environmental Liaison Units and State and Local Environmental Committees, elaborated implementation of 5-year Environmental Action Plan, addressed implementation of EIA, EIS and environmental audits and monitoring, addressed land use and planning and the protection of wetlands, lakes, rivers, hilly and mountainous areas, biodiversity, forests, rangelands, national heritage and the ozone layer.

The South Sudan National Environmental Policy and Environmental Bill form a basis for sustainable environmental management, however the challenge will be to make it work. Current signs of environmental mismanagement and their consequences such as riverbank erosion, invasive species, pesticide mismanagement, water and soil pollution, streams, rivers and canals sedimentation, deforestation and conflicts between resource users call for implementation of policies addressing these issues.7

3.0 Potential Environmental Impacts & Recommended Determinations

As set out in Section 1.3, for the purpose of environmental review, current and anticipated activities in the USAID funded Emergency Education Program are grouped into the following intervention categories.

1. Establish or rehabilitate 470 safe and protective integrated temporary learning spaces, using local materials and/or tents, as indicated.
2. Provide appropriate water and sanitation (WASH) facilities for these learning spaces, including building latrines, provision of sanitary pads, establishing hand-washing facilities and drilling boreholes;
3. Supply of teaching and learning materials;
4. Support for literacy and numeracy learning, life skills learning, psychological support for in and out-of-school children, adolescents and youth;
5. Training of teachers in life skills, peace-building and psychosocial support;
6. Advocacy and delivery of lifesaving messages, behavior change communications;
7. Administrative and logistics support, planning, assessments, coordination, monitoring and evaluation;

Each category contains a number of entailed activities. In this section, the entailed activities are described and their potential impacts analyzed. On this basis, Recommended Determinations are made. In some cases, Negative Determinations entail conditions. Upon approval of this IEE, Recommended Determinations are confirmed as 22 CFR 216 Threshold Decisions and conditions becomes required elements of activity implementation.

Note that activities may be implemented directly by UNICEF, and through sub-grants and/or sub-contracts. Determinations and conditions apply equally to ALL implementation mechanisms.

3.1 Establish or rehabilitate 470 safe and protective integrated temporary learning spaces, using local materials and/or tents, as indicated.

Activities involved in this intervention category are self-evident.

Potential Adverse Impacts & Considerations Regarding Recommended Determinations

Note that activities may be implemented directly by UNICEF, and through sub-grants and/or sub-contracts. Determinations and conditions apply equally to ALL implementation mechanisms.

Note that activities may be implemented directly by UNICEF, and through sub-grants and/or sub-contracts. Determinations and conditions apply equally to ALL implementation mechanisms.

Small-scale construction/rehabilitation efforts may present a number of potential adverse impacts and will depend on the scale of activities and on the local circumstances. Potential impacts of small-scale construction and establishment of structures include:

- Damage to sensitive or valuable ecosystems from construction of infrastructure, associated temporary worker dwelling, or construction storage units for personnel or equipment
- Removal of vegetation and/or compaction of the soil and grading of the site, altering drainage patterns and water tables, changing access to water by animals, people and vegetation, or degrading water resources
- Sedimentation of surface waters through removal of natural land cover, excavation, extraction of construction materials and other construction-related activities that result in soil erosion
- Contamination of groundwater and surface water supplies through improper disposal of human and other biological wastes during the construction period
- Use of toxic materials during construction
- Contamination of ground and surface water supplies through improper disposal or handling of toxic materials used in construction (e.g., solvents, paints, vehicle maintenance fluids (oil, coolant), and diesel fuel)
- Noise and dust pollution and damage to aesthetics of site/area

However, at the very small scales of renovation of 1-room structures, such impacts are very unlikely to be significant, assuming that basic good construction management practices are followed.

**Recommended Determinations**

Pursuant to the potential adverse impacts and considerations discussed above, the following determination is recommended for activities in this category:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Recommended Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Small-scale school construction (in which total surface area disturbed is less than 1000 m²), including rehabilitation of classrooms, establishing of tents</td>
<td><strong>Negative Determination</strong>, subject to the following <strong>Conditions(s):</strong></td>
</tr>
<tr>
<td></td>
<td>- Any small-scale construction/rehabilitation activities must integrate good-practice design standards for construction of primary and secondary day schools in Sub-Saharan Africa, as drawn from the USAID Sector Environmental Guidelines (<a href="http://www.usaidgems.org/Sectors/schools.htm">http://www.usaidgems.org/Sectors/schools.htm</a>), <a href="http://www.encapafrica.org/EGSSAA/Word_English/construction.doc">http://www.encapafrica.org/EGSSAA/Word_English/construction.doc</a> or similar. These standards must be specified in the EMMP (see Section 4 of this IEE).</td>
</tr>
<tr>
<td></td>
<td>- Materials used will be of local origin and will not contain any hazardous materials (i.e., asbestos or lead). All construction waste will be disposed of in environmentally safe manner</td>
</tr>
<tr>
<td></td>
<td>- Proper safeguards will be implemented to prevent destruction of vegetation and soil erosion</td>
</tr>
<tr>
<td></td>
<td>- Proper safeguards will be implemented to ensure worker and bystander health and safety.</td>
</tr>
</tbody>
</table>

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8 South Sudan, Sustaining and Advancing Demand for Delivery Learning and Education (SADDLE) program IEE-February 2013

April 29th 2015 USAID/South Sudan – Emergency Education Program – IEE amendment #1
3.2 Water, Sanitation and Health - WASH activities

This intervention category includes the following activities: Building latrines, provision of sanitary pads, establishing hand-washing facilities and drilling boreholes; WASH activities may present a number of potential adverse impacts.

Potential Adverse Impacts & Considerations Regarding Recommended Determinations

**Latrines.** Latrines, if improperly sited can contaminate shallow groundwater and wells and, when not well maintained or of an open-pit design, can be the source of multiplication of flies, mosquitoes, spread of diseases, and foul odors. More specifically, poorly designed sanitation facilities can lead to insect-borne diseases. There are two groups to consider: firstly, *culex* mosquitoes, which do not transmit malaria but can transmit *filariasis*, breed extensively in septic tanks and flooded latrines; and, secondly, flies and cockroaches often thrive on excreta and have been implicated in transmission of fecal-oral route disease. However, for small-scale interventions these impacts can be controlled below the level of significance by appropriate siting, maintenance and design.9

Poor design or design that is not appropriate for local geological conditions can cause a number of problems. Weak soil structure can lead to collapse of latrines especially during the rainy season. High water table will result in shallow pit latrines and potential for water contamination. High basement rock will result in shallow pit latrines. Flooding can be a constraint as latrines fill up and overflow during the rainy season. Latrines can collapse after the rainy season requiring rebuilding.10

Despite the significant potential benefits of improved sanitation, there is potential for non-adoption particularly due to lack of awareness and socio-cultural reasons. Poor operation and maintenance of latrines can also contribute to non-adoption, if is not considered from the planning and design stage.

However, for small-scale interventions these impacts can be controlled below the level of significance by appropriate siting, maintenance and design.

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9 IEE for USAID/Ghana Education Program, prepared by Patrick Hall & Kathleen Hurley, The Cadmus Group, Inc.

**Hand-washing stations.** Where washing stations are installed, under some conditions pools of standing water can become a ground for breeding vectors carrying water-borne disease. Water provided for hand-washing is generally not fit for human consumption, therefore teachers and children must be warned that water provided for hand-washing should not be used for drinking or washing food.

**Provision of sanitary pads.** Environmental pollution and health hazards can result from improper disposal of sanitary pads.

**Wells, boreholes, and water supply systems.** In operation, wells and bore holes can:

- Deplete groundwater when abstraction exceeds replenishment of groundwater resource.
- Create stagnant (standing) water in the vicinity of the water supply point and the creation of diseases vectors breeding sites (mosquitoes, risks of contamination of fetched water, foot infection of water point users, seepage in and contamination of the wells, etc.)
- Create human health risks from provision of biologically or chemically contaminated water. Even if water is not contaminated initially, it can become so thru flooding, failure to exclude livestock from the water point, use of contaminated containers to draw water from hand-dug wells, and other factors.
- Lead to human health risks from contamination of water fetched from the water points to the end users (arising from contamination of containers, mishandling, etc).

However, for small-scale interventions, these impacts can be controlled below the level of significance by appropriate siting, water quality assurance protocols (including testing), design (including drainage and exclusion of livestock from water points) and maintenance.

**Recommended Determinations**

Pursuant to the potential adverse impacts and considerations, the following determinations are recommended for the activities in intervention category 2: WASH activities

<table>
<thead>
<tr>
<th>Activity</th>
<th>Recommended Determination</th>
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</table>
| 2. Small-scale WASH activities (defined as isolated wells, boreholes and latrines such that the total investment in a given community is less than $250,000) including building latrines, provision of sanitary pads, establishing hand-washing facilities and drilling boreholes; | **Negative Determination**, subject to the following **Conditions(s):**
- If WASH activities include facility construction and/or rehabilitation, previous section addressing small scale construction will also apply.
- Latrine construction and related site sanitation efforts must conform with BMPs for the provision of small-scale sanitation as detailed in the USAID Sector Environmental Guidelines ([http://www.usaidgems.org/Sectors/watsan.htm](http://www.usaidgems.org/Sectors/watsan.htm)), or similar technical resource(s) and [http://www.bsf-south-sudan.org/sites/default/files/SS+Tech+Guide--School+Latrines.pdf](http://www.bsf-south-sudan.org/sites/default/files/SS+Tech+Guide--School+Latrines.pdf). These standards must be specified in the EMMP (see Section 4 of this IEE).
- Provisions will be made for proper maintenance of latrines and closing of old latrines where necessary
- Latrines shell include hand-washing stations with soakaways where appropriate |
• Provisions will be made for proper disposal of sanitary pads.

• Drinking water-related interventions must conform with BMPs for the provision of small-scale water supplies as detailed in the USAID Sector Environmental Guidelines (http://www.usaidgems.org/Sectors/watsan.htm), or similar technical resource(s).

• The establishment of new drinking water facilities or the rehabilitation of otherwise non-functioning water systems in a school setting will also require preparation and implementation of a Water Quality Assurance Plan (WQAP) that will ensure that all new and rehabilitated USAID-funded water supplies provide safe drinking water, defined as meeting local and WHO water quality standards.

This WQAP must be approved by the MEO prior to initiation of these activities.

The plan must include and assign responsibility to the IP for initial water quality testing. When feasible, the program must also set in place capacities and responsibilities to provide reasonable assurance that ongoing water quality monitoring occurs.

The standards for initial and ongoing testing— including 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.

The plan must include a response protocol in the event that the water does not meet water quality standards.

The plan must include testing for Arsenic per Guidance Cable State 98 108651 and fecal coliform. Specifically, the USAID managing team must assure that the standards and testing procedures described in “Guidelines for Determining the Arsenic Content of Ground Water in USAID-Sponsored Well Programs in Sub-Saharan Africa” (www.encapfrica.org/docs.htm#specificwater).

Note that this guidance requires initial testing, and quarterly testing for four quarters. If the program terminates in less than four quarters, remaining testing is the responsibility of the mission. Water violating the 10ppb Arsenic standard may not be supplied for public consumption.
3.3 Supply of teaching and learning materials

This intervention category includes the following activities: the preparation, publication and distribution of hard-copy instructional resources (books, pamphlets, readers, flashcards, charts, ECD kits etc.) for the purpose of teaching reading and math skills and other core academic subjects both inside and outside a classroom setting.

Potential Adverse Impacts & Considerations Regarding Recommended Determinations

Activities in this intervention category all belong to classes of activities than can be eligible for categorical exclusion. Because these activities present no foreseeable risk of adverse environmental impact—direct or indirect, there is no contraindication to categorical exclusion.

Recommended Determinations

A Categorical Exclusion is therefore recommended for all activities encompassed by intervention category 3: Supply of teaching and learning materials, per 22 CFR216.2 (c)(2)(i) (Education, technical assistance, or training programs) and (v) document and information transfers.

3.4 Support for literacy and numeracy and life skills learning and psychological support for in and out-of-school children, adolescents and youth;

This intervention category includes the following activities: Provision of physiological support, training in life-skills for out of school children, training on violence monitoring and reporting, ECD implementation.

Potential Adverse Impacts & Considerations Regarding Recommended Determinations

Activities in this intervention category all belong to classes of activities than can be eligible for categorical exclusion. Because these activities present no foreseeable risk of adverse environmental impact—direct or indirect—there is no contraindication to categorical exclusion.

Recommended Determinations

A Categorical Exclusion is therefore recommended for all activities encompassed by intervention category 4: Support for literacy and numeracy and life skills learning and psychological support for in and out-of-school children, adolescents and youth; per 22 CFR216.2 (c)(2)(i) (Education, technical assistance, or training programs) and (v) document and information transfers.

3.5 Training of teachers in life skills, peace-building and psychosocial support

This intervention category includes the following activities: Provide rapid teacher training/orientation on life skills, peace-building, and psychosocial support in collaboration with Child Protection. Support the training of teachers, PTA members and communities on gender and the importance of girls’ education, ensuring schools are safe environments for children.

Potential Adverse Impacts & Considerations Regarding Recommended Determinations

Activities in this intervention category all belong to classes of activities than can be eligible for categorical exclusion. Because these activities present no foreseeable risk of adverse environmental impact—direct or indirect—there is no contraindication to categorical exclusion.

Recommended Determinations

A Categorical Exclusion is therefore recommended for all activities encompassed by intervention category 5: Training of teachers, per 22 CFR216.2 (c)(2)(i) (Education, technical assistance, or training programs) and (v) document and information transfers.
3.6 Advocacy and delivery of lifesaving messages, and behavior change communications;

This intervention category includes the following activities: Advocate for the vacation of schools occupied by armed forces and IDPs and communication of importance of girls’ education.

Potential Adverse Impacts & Considerations Regarding Recommended Determinations

Activities in this intervention category all belong to classes of activities than can be eligible for categorical exclusion. Because these activities present no foreseeable risk of adverse environmental impact—direct or indirect—there is no contraindication to categorical exclusion.

Recommended Determinations

A Categorical Exclusion is therefore recommended for all activities encompassed by intervention category 6: Advocacy and delivery of messages, per per 22 CFR216.2 (c)(2)(i) (Education, technical assistance, or training programs) and (v) document and information transfers.

3.7 Administrative and logistics support, planning, assessments, coordination, monitoring and evaluation.

This intervention category includes the following activities Education needs, assessments, development of response plans, field monitoring/evaluation initiatives, communications, and administrative and cross-sectoral support, including logistics (transport, warehousing, logistical, security & field operations support)

Potential Adverse Impacts & Considerations Regarding Recommended Determinations

Conducting assessments, planning and monitoring and evaluation carry no risk of direct adverse environmental impact. The project activities that results from these assessments (e.g. the identification of structures to rehabilitate or WASH installations required) may have indirect impacts, which are addressed under other activity categories. The motor pool and office operations involved in logistics support do have adverse effects (e.g. fuel use, vehicle maintenance wastes), but these are negligible and part of almost all development activities, even categorically excluded ones. All activities belong to classes of activities eligible for categorical exclusion, and there is no contraindication to such exclusion.

Recommended Determinations

A Categorical Exclusion is therefore recommended for all activities encompassed by intervention category 7: Administrative and logistics support, planning, assessments, coordination, monitoring and evaluation, per per 22 CFR216.2 (c)(2)(iii) Analyses, studies, academic or research workshops and meetings; and (v) document and information transfers.

4.0 GENERAL PROJECT IMPLEMENTATION AND MONITORING REQUIREMENTS

In addition to the specific conditions enumerated in section 3, the determinations recommended in this IEE are contingent on full implementation of the following general monitoring and implementation requirements:

1. IP Briefings on Environmental Compliance Responsibilities. The Mission Education team shall provide UNICEF, with a copy of this IEE and brief UNICEF on their environmental compliance responsibilities

2. Development of EMMP. UNICEF shall develop and provide for C/AOR review and approval an Environmental Mitigation and Monitoring Plan (EMMP) documenting how their project will
implement and verify all IEE conditions that apply to their activities.

These EMMPs shall identify how the UNICEF shall assure that IEE conditions that apply to activities supported under sub-contracts and sub-grant are implemented. (In the case of large sub-grants or sub-contracts, UNICEF may elect to require sub-grantees/sub-contractors to develop their own EMMP.)


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

UNICEF 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.** The Education team shall assure that the PIO award references and requires 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.

UNICEF shall assure that sub-contracts and sub-grant agreements reference and require compliance with relevant elements of these conditions.

5. **Assurance of sub-grantee and sub-contractor capacity and compliance.** UNICEF shall assure that sub-grantees and sub-contractors have the capability to implement the relevant requirements of this IEE. UNICEF shall, if appropriate, provide training to sub-grantees and sub-contractors in their environmental compliance responsibilities and in environmentally sound design and management (ESDM) of their activities.

6. **Education team monitoring responsibility.** As required by ADS 204.5.4, the Education team will actively monitor and evaluate whether the conditions of this IEE are being implemented effectively and whether new or unforeseen consequences arise 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, UNICEF, in collaboration with the 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 Education team 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 UNICEF, sub-grantee and sub-contractor responsibility for compliance with all applicable host country laws and regulations. UNICEF, sub-grantees and sub-contractor 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.

5.0 **Application of USAID Environmental Regulations to PIO Awards (ADS 308.3.11)**

ADS 308.3.11 states that “USAID should strive to rely upon the PIO’s application of its own environmental policies to the activity proposed and include appropriate language in the PIO agreement. Any environmental conditions proposed to ensure adequate environmental review of the activity proposed should have due regard to both the independence and sovereignty of the PIO and the purpose and intent of the environmental impact assessment requirements of USAID.” Therefore, should UNICEF determine that elements of the conditions enumerated in sections 3 or 4 are not compatible with UNICEF’s environmental policies and procedures, UNICEF may propose alternate environmental management commitments responsive to the potential adverse impacts identified in this IEE and the intent of the conditions established in sections 3 and 4. The Regional Environmental Advisor (REA) is authorized to approve these alternate commitments, without need for amendment of this IEE. Appropriate language should be included in the PIO agreement.