1. **Background and Project Description**

1.1 **Purpose and Scope of IEE:**

The purpose of this IEE is to provide an evaluation of the proposed actions under the Community Based Approach to Support Youth in Targeted Municipalities in BiH activity, PIO Grant to the International Organization for Migration (IOM), and to recommend a threshold decision applicable to the proposed scope of work.

1.2 **Project Overview:**

The war in Bosnia and Herzegovina (BiH) began in April 1992 and ended with the Dayton peace agreement in November 1995. According to Research and Documentation Center, minimum 97,207 individuals were killed. Some 65% of those killed were Bosniaks, followed by 25% Serbs and more than 8% Croats. This terrible loss of life made a profound impact on all ethnic groups. In the intervening 15 years progress has been made with the establishment of formal democracy, the mainly successful reconstruction of damaged infrastructure, the near 100% return of property to pre-war owners and the restoration and ongoing reform of state institutions. Despite this BiH remains a volatile and conflict-ridden environment beset by many challenges to its long-term peace and security. Among these is the continued predominance of divisive nationalistic politics at all levels of society, eroding efforts to build a common Bosnian identity and strong central state institutions, prolonging...
tensions between ethno-national groups and encouraging discrimination and, on occasion, violent crime on the basis of national affiliation.

The children born during and immediately after the war are teenagers and adults today. Contrary to their parents, they carry no memories of the pre-war life: playing with kids of all ethnic backgrounds in kindergartens and neighborhoods, attending schools together or sharing office desk. According to Mozaik’s baseline survey on community relations, violence and conflict implemented in 2010, approximately 48% of respondents who were older than 24 years preferred ethnically homogenous neighborhoods, while it also prefers to 62,9% of youth aged 15-19 years. These teenagers are raised by parents who were heavily impacted by the recent loss of life and show severe mistrust towards other ethnic groups. Most parents of all ethnic groups consider themselves victims of “other groups” and generally prefer their children to be raised in mono-ethnic environments.

Economic and administrative centers in BiH suffer less from the mistrust and separation. Many international organizations and companies have proven that ethnically mixed teams of people function well and often better than single-ethnic teams. These examples show that population of BiH is able to overcome differences if they share common objectives. In rural areas, however, youth have hardly any opportunities to mix and work towards common objectives. The segregation there is almost total. These young people are easily manipulated by nationalistic rhetoric and extremist groups.

The government is doing very little or nothing to help overcome this divide. A number of development organizations target youth reconciliation and employment. Most of these interventions, however, are imposed from outside, leaving little or no space for youth to develop their potentials. Further on, these interventions are typically stand-alone and short-term projects, failing in building local capacities and long-lasting partnerships with multiple stakeholders: governments, schools, other NGO’s, business and media.

BiH faces a unique struggle in the economic and political disenfranchisement of youth. Most of the socio-economic burdens in BiH are borne by citizens aged 18-35, who also are the most vulnerable to petty and high-level corruption. Most notably, youth unemployment is estimated at nearly 60%.[1] Lack of private sector growth and an education system that fails to develop professional skills and critical thinking necessary for employment and entrepreneurship also contributes to the economic narratives of radical ideologies. Youth who do have the ability to succeed in BiH’s complex political and socio-economic environment tend to leave contributing to a brain drain that has deleterious impacts on community cohesion.

In addition to economic struggles, today’s youth have inherited the ethnic tensions of their parents. These ethnic divides have been strengthened by a lack of inter-ethnic mobility and laws that emphasize ethnicity in all sectors of public policy—from voting to obtaining public sector jobs. New anti-social behavioral trends in ethnic relations have emerged among youth who have limited opportunities to participate in joint activities with other ethnic groups. These, combined with political party narratives that leverage this fear and distrust, contribute to stereotypes, prejudices and further alienation.

Significant proportions of young people in Bosnia and Herzegovina, particularly in rural and sub-urban areas, are disenfranchised and disengaged. Some of them are angry at political and socioeconomic elite that is often seen as corrupt, self-serving, and not responsive to their needs. Though joblessness alone does not drive young people to violent extremism, the perception of injustice pertaining to this joblessness, as well as injustice based upon corruption and other failings of the state, constitute drivers of violent extremism. In most of these communities, particularly those outside principal cities, young people exist on political and social peripheries; this marginalization constitutes a persistent source of hostility.

1.3 Project Description:

This activity is designed with the overall objective to contribute to countering the possible development of violent extremism through piloting new approaches to reduce youth disenfranchisement and enhance the scope for young people to proactively participate in community initiatives. This will be realized through achieving the following four specific objectives, as follows:

- Young people in targeted communities have enhanced resilience to the drivers of violent extremism
• Demand-driven vocational intervention in the context of CVE is implemented in the selected communities, based upon training designed through pilot
• Increased social capital within targeted communities as young people become the drivers of positive change
• Project is strategically interlinked with other CVE approaches (both “hard” and “soft”) at the community level to facilitate a holistic approach

The pilot project will be implemented in four at-risk communities, in which there is evidence of young people already having been drawn to violent extremism. The pilot will be implemented in two rural communities and two urban, in order to allow the project to determine any differences between the key drivers of extremism between urban and rural communities, and whether differing approaches are thus appropriate. The findings from this pilot project would also inform the design and implementation of a community stabilization-type project at a wider level in BiH. The activity will measure the following higher level outcome indicators which will feed directly into the results of Project 1.2:

• % of targeted youth that believe in their ability to render impactful change at a personal and community level (disaggregated by gender); and
• Percentage of young people that receive tailored vocational training that are enjoying income generation six months subsequent to the conclusion of the project

The activity has seven components:

Component 1: Inception Phase: Conduct analysis on the perception of community members, public institutions and non-state actors on issues of discrimination, corruption, and other drivers of VE within targeted communities. Analysis will be undertaken in each of the targeted communities, taking into account the perceptions of a wide range of actors, to determine critical issues, drivers, and solutions concerning the propensity for young people to be drawn to violent extremism within their community. This analysis will be based upon a public perception survey and focal groups. The analysis of the findings will allow the project to adjust and tailor activities to each targeted community; in this context, the nature and prioritization of activities may differ between communities. The analysis will also serve to highlight any differences between drivers and key interventions in rural and urban communities, as well as allowing the project to demonstrable measure the impact of the intervention.

Component 2: Provide psychosocial support to persons vulnerable to radicalization in the targeted community through trained and experienced teams of psychologists. The project will design and oversee individual and group psychosocial sessions focused on confidence and identity building, as well as improving self-esteem, and improving critical thinking, with the aim of enhancing the resilience of beneficiaries. The psychologists who will organize these workshops will establish a preliminary methodology, taking local contexts into account, to ensure concrete steps are developed before the actual sessions start. The target group will encompass unemployed and underemployed persons, particularly youth. The workshops will be organized in the Local Community Centre, and advertised by local stakeholders, to ensure the target beneficiaries are reached.

Component 3: Undertake comprehensive analysis of employment as a driver of VE and design demand-driven vocational support. IOM will undertake a comprehensive analysis of unemployment as a driver of VE in BiH, as well as of critical labor market needs, in order to design a targeted intervention within this sphere. This intervention will be designed in consultation with young people, and be demand-driven, to best ensure linkages to opportunities for sustainable income generation within the local economic sphere. The support will be designed to equip beneficiaries with enhanced knowledge and skills required to assist them in securing income generation. To broaden the impact of the subsequent intervention, the support may also encompass themes of reconciliation, critical thinking, advocacy, bravery, and media and reconciliation, as deemed appropriate and productive through the analysis.

Component 4: Introduce a flexible small grants scheme (> USD 3000) within the targeted communities to fund sustainable community-led, outward facing, community-wide initiatives that counter the drivers of violent extremism. Based on locally-defined pertinent needs – to include funds for: cultural events; sporting
events; performing arts productions; creation and dissemination of films; and infrastructure interventions, such as the (rehabilitation of youth center, tennis court, etc. depending on the most pertinent local needs identified. The grants will focus on raising self-confidence of the beneficiaries and will support the notion that working for positive change in society can actually have tangible results. In order to maximize the mutual reinforcement of activities, it is foreseen that beneficiaries assisted through Activities 1 and 2 will be engaged in the small grants scheme; in this context, the group psychosocial sessions will encourage reflection on activity progress, engagement in socially beneficial work, motivation and other psychosocial aspects of the activity.

**Component 5: Support community debates on sensitive topics, bringing together influencers and wider community.** Community debates will be held on a monthly basis, bringing together community members to discuss and critically reflect on ideas including inter alia, democratic principles; transitional justice; ethno-nationalist mantra; and active citizenship. Events will involve high-quality speakers, with topics conceptualized to stimulate positive dialogue and debate. A sub component of the public debates will be dedicated specifically to identifying and engaging moderate religious leaders, and ensuring that they are provided with new platforms to promote interfaith and intercultural dialogue and facilitate critical discussion of religion. These forums will enable religious leaders to support young people to critically analyze and articulate attitudes towards religion in Bosnia and Herzegovina today. These forums will serve to highlight positives and legitimize diversity within religion.

**Component 6: Provide support for youth-led media work that promotes tolerance, as well as moderate voices, in order to counteract VE, by creating alternative, positive, narratives.** Media and outreach workshops will be organized for a number of young people, who will be supported in proactively participating in local media, either through involvement within existing media outlets, or by establishing new media outlets, depending on the local needs and capacities. The target beneficiaries will be marginalized youth, who have been deprived of a voice in their community. The workshop will encompass capacity building concerning journalistic skills, outreach, and use of online resources, and will adopt a workshop format, to ensure the participation and engagement of youth at all levels. Furthermore, the workshops will also sensitize youth media members from the target municipalities, to enhance awareness of the adverse effect that negative media output can have on wider society in radicalizing public discourse. The training will thus encompass a focus upon the issues concerning media outlets further propagating misconceptions about minority religious and / or social groups, which can result in prejudice and discrimination, which are strong precursors to radicalization.

**Component 7: Build capacity of parents as influencers to identify and prevent Violent Extremism.** The activity will develop education modules for parents, to promote knowledge of the dangers and warning signs of extremism. By identifying early warning signs, parents will be encouraged to seek out relevant organizations that have pre-existing programs of support. In order to ensure that parents are comfortable with bringing in outside support into perceived internal family issues, a component of the activity will be designed to raise awareness of the dangers of VE, and radicalization dynamics. The activity will be based on the results of the research conducted at the inception phase of the project. Additionally, the education modules will be designed to enhance their awareness on specific ways to communicate and use their influence as parents to prevent violent extremism. Informal and participatory capacity building sessions will be held in each targeted community based upon these training modules.

2. **Baseline Environmental Information**

2.1. **Locations Affected and Environmental Context:**
   The activities under this IEE will be implemented on the territory of Bosnia and Herzegovina. Four target communities will be selected at the latter date.

2.2. **Description of Applicable Environmental and Natural Resource Legal Requirements Policies, Laws, and Regulations:**
   BiH has a State level government, which is administratively subdivided into two entity governments: the Federation of Bosnia and Herzegovina (FBiH) and RepublicaSrpska (RS). The FBIH is further subdivided into
10 cantons. Municipal level is the lowest form of government. In addition to the entities, which are divided into municipalities, there is also the Brcko District.

There are no institutions at the State level that are entirely dedicated to either environmental protection. In other words, there is no State level Ministry for the Environment; neither there is a Law on environment at the State level. As per the Constitution, Entity level governments regulate environmental issues through their laws, regulations and standards.

However, Ministry for Foreign Trade and Economic Relations (MoFTER) has been delegated to manage certain environmental and agricultural issues at the State level in the absence of dedicated State level Ministries as per the Law on Ministries and other bodies of administration of BiH (Official Gazette of BiH, No. 5/03) enacted in March 2003. MoFTER is responsible to define and coordinate activities between the Entity authorities and institutions at the international level, in the field of environmental protection, agriculture, energy and natural resources and administer enforcement of relevant laws and other regulations. In order to improve and standardize environmental legislation, both entities drafted a set of 6 environmental laws that are largely in accordance with EU acquis:

- The Framework Law on Environmental Protection;
- The Law on Air Protection;
- The Law on Water Protection;
- The Law on Waste Management;
- The Law on Nature Protection, and
- The Law on the Fund for Environmental Protection

These laws represent a framework for the legal protection of the environment, setting forth basic principles of the protection, defining basic notions and terms, as well as authorities responsible for policy implementation. They also lay down basic rules for drafting specific measures in the function of environmental protection policy implementation, as well as that of environment conservation and improvement.

2.3. Country/Ministry/Municipality Environmental Capacity Analysis:

**Federation BiH:** Environmental management in the Federation BiH is uneconomical and unsustainable. The main reason for this serious lack of coordination, disorientation, and duplication between the different levels of administration responsible for environmental issues lies in the fact that institutionalized mechanisms and channels for exchange of information virtually do not exist. In addition to the relevant ministries involved in the environment and biodiversity, the Federation has quite an impressive number of specialist institutions that provide expert consulting, inspection and monitoring, and/or services that protect citizens, property and the environment/biodiversity from natural disasters. These institutes and agencies work under relevant ministries or report directly to the government. While the structure and number of institutions is rather impressive, the lack of inter-ministry coordination on all levels, as well as weak information exchange, are serious issues that impede and obstruct efficient environment/biodiversity management. Additionally, inadequate experience in environmental management of ministerial staff often results in serious gaps between the legal requirements and actual implementation.

The environmental protection legal framework in FBiH consists of five laws that were developed and adopted in 2003 at the entity level:

- Law on Environmental Protection;
- Law on Nature Protection;
- Law on Waste Management;
- Law on Air Protection; and
- Law on Environmental Protection Fund.

Adoption of these laws was a crucial step towards harmonizing BiH legislation with the EU. Although, FBiH adopted several of the sub-laws that harmonized many aspects of environmental protection with the EU legislation, the process of harmonization is far from finished. The process of harmonization must continue in order for FBiH to meet all EU directives related to regulating the environment. The main impediments to
harmonization are the lack of a vision and the lack of a strategy for improving the efficiency of the harmonization processes.

Furthermore, harmonization of legislation is required within the legal structure in the entity and cantonal governments. The environmental laws adopted in 2003 were at the entity level, and some cantons have never adopted cantonal laws. In addition, some cantonal laws were adopted prior to the year 2003; so many provisions in these laws are inconsistent with the 2003 entity environmental laws.

The RepublikaSrpska (RS): The institutional framework for environment in the RS is simpler than the one in FBiH. There are only two levels of administration in the RS: entity and local. Similarly to FBiH, there are public enterprises tasked with specific consulting, monitoring or other services related to the environment.

At the entity level, the Ministry for Spatial Planning, Construction, and Ecology is responsible for all issues related to the environment. This Ministry is responsible for drafting and adopting laws, implementing laws relevant to environmental protection, recommending areas to be protected, and monitoring and supervising work of local/municipal administrations. Within this ministry, there is a specialized department that handles environmental issues. Some responsibilities at the entity level related to the environment are also delegated to the Ministry of Agriculture, Forestry and Water Works; the Ministry of Education; and the Ministry of Trade and Tourism. The roles and responsibilities of each of these ministries have been defined by the Law on Ministries (2002). This same law provides for the role of the Public Institute for Protection of Cultural, Historical and Natural Heritage of RepublikaSrpska. This institution is tasked with all works related to protected areas, including updating the register of protected areas. They also provide expert and consulting services related to protection of the RS. In its work, the institute cooperates with other public institutions in the RS, such as faculties, museums, etc. In addition, and similarly to FBiH, there are public enterprises that manage natural parks. In the RS, there are two such institutions that are responsible for the national nature parks, Sutjeska and Kozara. Also, there is a public enterprise “SrpskeSume” that is responsible for overall management of all forests in the RS.

The most significant legislative reform related to the environment in the RS was the adoption of a set of entity laws on the environment. This set of five laws was drafted and adopted by both entities at the same time and are harmonized with EU legislation regulating the environment. Furthermore, and similarly to FBiH, there are other pieces of legislation that regulate certain aspects of the environment that were adopted in the RS. These include the following:

- Law on Forests (2003);
- Law on Hunting (2002);
- Law on National Parks (2005);
- Law on Waters (2006);
- Law on Agricultural Lands (2006);
- Law on Fishing (2002);
- Law on Communal Police (2003);
- Law on Fees for Utilizing Natural Resources for Energy Generation (2003); and

The RepublikaSrpska is facing some of the same issues as FBiH, including the requirement for full harmonization of its legislation with EU regulations. As previously stated, in order to harmonize its legislation with the EU, the BiH government started revising existing laws in 2006. This project was financed by the EC with the ultimate goal of monitoring the level of harmonization with EU regulations.

2.4. Sustainability Analysis:
To address the sustainability issue in a broad context, and to protect the USG investment, USAID makes sure that its activities comply with all relevant recommendations prescribed in the EU accession documents for BiH. These reforms are required for EU accession, so their sustainability is guaranteed by the strict EU conditionality, and driven by the country’s strong commitment and keenness to join the EU.
To ensure sustainability in a context of long-term development, USAID verifies that all of its activities are in line with the guiding principles for sustainable development described in the renewed EU Strategy for Sustainable Development (EU SDS), adopted by the European Council in June 2005. The focus of the EU Sustainable Development Strategy is on ecological and social potential of the economy and economic growth. The Strategy promotes the idea and sets the conditions for sustainable economic development that ensures better quality of life through economic growth that is conscious of, and responsive to the environment and natural resources. All EU activities, particularly those in the policy arena, must be designed in accordance with the Strategy. The Strategy outlines education and public finance as important key instruments and preconditions in facilitating the transition to a more sustainable development. The Sustainable Development Indicators (SDIs) are used to monitor the EU Sustainable Development Strategy in a report published by Eurostat every two years.

2.5. Climate Change Vulnerability Analysis: n/a

3. Analysis of Potential Environmental Impact

The general principles underlying this IEE are that USAID Environmental Procedures (22 CFR 216) will be followed to ensure that all potential environmental impacts of the activity are identified and considered by stakeholders, and that appropriate procedures and safeguards are put in place to ensure that activities cause no adverse significant consequences to the environment.

Prior to implementation it is necessary to identify any existing environmental concerns at a specific cite/facility as well as potential adverse environmental impacts from the implementation of energy efficiency renovations and rehabilitations.

3.1. Component 1: Inception phase

<table>
<thead>
<tr>
<th>Defined/Illustrative Activities</th>
<th>Potential Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Conduct analysis on the perception of community members, public institutions, and non-state actors on issues of discrimination, corruption, and other drivers of VE within targeted communities.</td>
<td>None anticipated</td>
</tr>
</tbody>
</table>

3.2. Component 2: Provide psychosocial support

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<thead>
<tr>
<th>Defined/Illustrative Activities</th>
<th>Potential Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Provide psychosocial support to persons vulnerable to radicalization in the targeted community through trained and experienced teams of psychologists.</td>
<td>None anticipated</td>
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</tbody>
</table>

3.3. Component 3: Undertake a comprehensive analysis of employment as a driver of VE and design demand-driven vocational support

<table>
<thead>
<tr>
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<th>Potential Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1 Undertake comprehensive analysis of employment as a driver of VE</td>
<td>None anticipated</td>
</tr>
<tr>
<td>3.2 Design demand-driven vocational support</td>
<td>None anticipated</td>
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</tbody>
</table>
3.4. Component 4: Introduce a flexible small grants scheme (> USD 3000) within the targeted communities to fund sustainable community-led, outward facing, community-wide initiatives that counter the drivers of violent extremism.

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<thead>
<tr>
<th>Defined/Illustrative Activities</th>
<th>Potential Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1 Arranging spaces for youth activities such as small repairs to already existing public spaces and premises including rehabilitation of youth centers, tennis courts, (such as plastering works, changing windows and doors, insulation works, floor and wall covering works, wood flooring works, fixing dry walls and painting, replacement/repair of gutters, with additional activities as building protective fence around playgrounds and/or building stands near playground, etc.</td>
<td>Air, Water, Soil, Waste</td>
</tr>
</tbody>
</table>

3.5. Component 5: Support community debates on sensitive topics, bringing together influencers and wider community.

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<thead>
<tr>
<th>Defined/Illustrative Activities</th>
<th>Potential Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.1 Organization of roundtables, workshops, conferences</td>
<td>None anticipated</td>
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</tbody>
</table>

3.6. Component 6: Provide support for youth-led media work that promotes tolerance, as well as moderate voices, in order to counteract VE, by creating alternative, positive, narratives.

<table>
<thead>
<tr>
<th>Defined/Illustrative Activities</th>
<th>Potential Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.1 Organization of roundtables, workshops, conferences</td>
<td>None anticipated</td>
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</tbody>
</table>

3.7. Component 7: Build capacity of parents as influencers to identify and prevent Violent Extremism.

<table>
<thead>
<tr>
<th>Defined/Illustrative Activities</th>
<th>Potential Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.1 Develop education models for parents</td>
<td>None anticipated</td>
</tr>
</tbody>
</table>

4. Recommended Environmental Actions:

4.1 Recommended Mitigation Measures: Pursuant to 22 CFR 216.3(a)(2)(iii), the Mission has reviewed the potential environmental impacts of this activity, and determined that the project will most probably not have a significant impact or effect on the environment. To ensure activities do not have a negative impact on the environment, subject to provisions in ADS 308.3.11.c specific environmental review will be conducted by IOM to evaluate potential environmental concerns and impacts and ensure that (if needed) activities have appropriate mitigation and monitoring of the identified adverse environmental impacts. The implementer will ensure that all supported project activities are in compliance with, and follow local environmental laws and regulations.
**Component 4:** Introduce a flexible small grants scheme (> USD 3000) within the targeted communities to fund sustainable community-led, outward facing, community-wide initiatives that counter the drivers of violent extremism.

<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>4.1 Arranging spaces for youth activities such as small repairs to already existing public spaces and premises including rehabilitation of youth centers, tennis courts, (such as plastering works, changing windows and doors, insulation works, floor and wall covering works, wood flooring works, fixing dry walls and painting, replacement/repair of gutters, with additional activities as building protective fence around playgrounds and/or building stands near playground, etc.)</td>
<td>Air, water, soil, waste, human health</td>
<td>IOMs Standard Social and Environmental Screening Procedure (SESP)</td>
<td>Negative Determination</td>
</tr>
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</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 3.1; 3.2; 6.1; and 7.1 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.);
Activities 1.1; 2.1; and 5.1 under §216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings.

Negative Determination with Conditions: Under §216.3(a)(2)(iii), a negative determination with conditions is recommended for Component 4, activities described under 4.1. Specific terms and conditions are presented below in Section 4.3.

4.3. Terms and Conditions:
Subject to provisions set in ADS Chapter 308 (Awards to Public International Organizations), and specifically to the language set in 308.3.11.c (Application of USAID Policies and Procedures / Application of USAID Environmental Procedures) “In awarding cost-type grants to PIOs with their own environmental policies, for activities that are not exempt or categorically excluded from environmental analysis under 22 CFR 216, USAID should strive to rely upon the PIO’s application of its own environmental policies”, USAID will relay upon UNDP’s Standard Social and Environmental Screening Procedure (SESP) for determining Environmental Impact, and appropriate Mitigation Measures and additional environmental policies.

4.4 USAID Monitoring and Reporting:
4.4.1 The 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 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 supplemental IEE be developed by activity implementer, who will prepare such analysis as part of the intervention, and prior to the actual implementation of the activities. The subject analysis will subject to approval by the COR and MEO in consultation with the BEO.
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 several indicators 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:

[Signature]

David Barth, Mission Director

Date: 6/19/15

Clearance:

[Signature]

Mirela Hasimbegovic, Mission Environmental Officer

Date: 6/19/15

PPO Distribution:

[Signature]

Steven Majors, Program Office Director

Date: __________

Concurrence:

[Signature]

Mark Kamiya

E&E Bureau Environmental Officer

Date: 06/25/2015

**Distribution:**

IEE File
MEO (to also provide a copy to AOR/COR)