PROGRAM/ACTIVITY DATA:
Program/Activity Number:
Country/Region: West Africa
Program/Activity Title: West Africa Biodiversity and Climate Change Project (WA-BiCC)
Funding Begin: FY2014 Funding End: FY 2018
LOP Amount: $60 M
Sub-Activity Amount: $49 M
IEE Prepared By: Benjamin Opoku, Regional Environmental Compliance Advisor and MEO/USAID/WA ; Jody Stallings, Regional Environmental Advisor
Current Date: August 23, 2015
Expiration Date: September 30, 2019

IEE Amendment (Y/N): Yes. West_Africa_Biodiversity_Climate_Change_IEE. 07082014

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)
Categorical Exclusion: X Negative Determination: X
Positive Determination: Deferral:

ADDITIONAL ELEMENTS: (Place X where applicable)
CONDITIONS_ X_ PVO/NGO: ___X____ EMMP : ___X____ ERF/ERR : ___X____

SUMMARY OF FINDINGS
This IEE supersedes and completely replaces the original IEE (link above). The purpose of this IEE Amendment is to update and revise the activities to be implemented under the WA Biodiversity and Climate Change (WA-BiCC) project. The overall goal of the project is unchanged, which is to improve conservation and resilient low-emissions growth in West Africa. However, the original IEE was written in alignment with the main components of the PAD, and the actual technical activities for the WA-BiCC project differed from those components.

The current WA-BiCC goals will be met through three intervention areas, or activities, as follows:

- Combat wildlife trafficking
- Coastal resilience improved in West Africa
- Deforestation, degradation and biodiversity loss reduced in key forests
In accordance with 22CFR216, this IEE provides the initial review of all activities to be implemented with respect to the reasonably foreseeable effects on the natural and physical environment and provide recommended threshold determinations including attendant conditions in some instances for all planned and foreseen activities under WA-BiCC.

**Recommended Threshold Determinations**

This section provides summarized recommended threshold determinations for all activities to be implemented under the WA-BiCC program. It synthesizes the recommended threshold determinations according to intervention areas of the project. Detailed Reg. 216 citations, including conditions in some instances, are referenced in section 3.0 of this IEE.

<table>
<thead>
<tr>
<th>Intervention categories</th>
<th>Categorical exclusion</th>
<th>Negative Determination</th>
<th>Negative Determination with conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Combat wildlife trafficking</td>
<td>✓</td>
<td></td>
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<tr>
<td>Coastal resilience improved in West Africa</td>
<td>✓</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Deforestation, degradation and biodiversity loss reduced in key forests</td>
<td>✓</td>
<td>✓</td>
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</tbody>
</table>

**General Implementation & Monitoring Conditions**

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

a) Implementing Partner briefings on environmental compliance responsibilities

b) For small grants and sub-grants programs, introduce / adapt the formal USAID AFR subproject/subgrant review process, using the AFR Environmental Review Form.

c) Development of environmental mitigation and monitoring plans (EMMPs)

d) Integration and implementation of EMMPs in work plans and budgets

e) Integration of compliance responsibilities in prime and sub-contracts and grant agreements

f) Assurance of sub-grantee and sub-contractor capacity and compliance;

g) WA-BiCC team environmental compliance oversight and monitoring;

h) 22 CFR 216 documentation coverage for new or modified activities; and
i) Compliance with host country requirements

As required by ADS204.3.4, the USAID/WA RAO team managing this activity will actively monitor and evaluate whether environmental consequence unforeseen by this IEE arise during project implementation and modify or end activities as appropriate. Further, if additional activities not covered by this IEE are added to the Activity, an amended environmental examination will be prepared and approved prior to implementation of activities.
APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

West Africa Biodiversity and Climate Change Project (WA-BiCC)

CLEARANCE:
Acting Mission Director, USAID/WA ____________________________ Date: 8/24/15
Brad Wallach

CONCURRENCE:
AFR/SD Bureau Environmental Officer: ________________________ Date: 9/6/15
Brian Hirsch

Filename: WestAfrica_Biodiv_Climate_Change_IEE_071315.

ADDITIONAL CLEARANCES:
REA Tracking #: USAID_WA_IEE_ROECCR_

ROECCR Office Director (Acting) __________________________ Date: 2/4/16
Jody Stallings

Agreement/contracting Officer Rep _____/s/________________________ Date: __________
Jody Stallings

Mission Environment Officer ___________/s/____________ Date: __________
Benjamin Opoku

Regional Environment Advisor _______/s/________________________ Date: __________
Jody Stallings
1. BACKGROUND AND ACTIVITY DESCRIPTION

1.1 Purpose and Scope of the IEE

This IEE Amendment addresses the entire scope of activities to be implemented under the WA Biodiversity and Climate Change (WA BiCC) project. The overall goal of the project is to improve conservation and resilient low-emissions growth in West Africa. In accordance with 22CFR216, this IEE provides the initial review of all activities to be implemented with respect to the reasonably foreseeable effects on natural and physical environment and provides recommended threshold determinations including attendant conditions in some instances for all planned and foreseen activities under WA-BiCC.

1.2 Background and Program Description

The West Africa Biodiversity and Climate Change project (WA-BiCC) is a multifaceted regional activity that contributes to USAID/WA’s Development Objective DO2: Broad based economic growth and resilience advanced through West African partners. The goal of the project is to improve conservation and resilient low-emissions growth in West Africa. This will be achieved through three components:

a. Ecologically sound practices, tools and approaches for resilient growth demonstrated
b. Improved environmental governance in the region
c. Enhanced capacity to integrate climate change and biodiversity conservation into decision making

Two cross-cutting purposes complete WA-BiCC’s strategy: 1) Private-public partnerships (PPP) catalyzed; and 2) Gender equity promoted in activity design and implementation.

There are strong reasons for concern over the West African environment. For example:

- The Guinean Forest, a biodiversity hotspot, regulator of the hydrological regime of the region’s major rivers, and home to some of the last remaining western chimpanzee populations has been reduced to an estimated 15% of its original cover.
- The region has lost between 21% and 50% of its mangrove cover in the last 25 years.
- The hydrologic regimes of the region’s largest rivers are experiencing declines in volume flow that cannot be explained by variation in rainfall.
- Over the past 40 years Lake Chad has shrunk to 3% of its original area.

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2 UNEP (2007) Mangroves of Western and Central Africa UNEP-Regional Seas Program/UNEP-WCMC
• Marine fisheries are over exploited and production is falling behind population growth⁴;
• Wildlife poaching, trade, trafficking and over-harvesting are rampant⁵;
• Rising sea levels, variations in freshwater delivery to estuaries, and anthropogenic local and offsite stressors compromise the health of mangroves and coastal lagoons.
• Rising sea-levels threaten coastal cities and critical infrastructure (ports, roads).

It is widely accepted that healthy ecosystems and the services they provide are essential components of climate change adaptation and resilient natural and socio-economic systems. In West Africa two ecosystems are particularly important as providers of ecosystem services: coastal ecosystems and the Guinean Forest⁶. The following examples illustrate why:

• West Africa’s coastal ecosystems are the region’s food basket. As the breeding ground and nursery for commercial fish species, West Africa’s mangroves play a crucial role in the region’s economy by supporting a $400 million dollar⁷ (annually) commercial fishing industry. Fish contribute at least 50 percent of total animal protein intake in the Gambia, Ghana, and Sierra Leone. The collection of mollusks, crustaceans and non-commercial species in mangroves is an essential element of livelihood strategies for poor coastal communities, households and vulnerable groups such as women and children. The value of ecosystem services provided by one square kilometer of mangrove has been calculated to be between $200,000 and $900,000 annually.
• Coastal ecosystems, particularly mangroves play a fundamental role in buffering coastal zones against tide surges and coastal erosion, provide essential habitat for migratory birds, and are an important source of energy and construction material.
• The regulation of the hydrological cycle by the Guinean Forest ecosystems, where the most important West African rivers originate, is vital for the region’s economy, food, security, transportation, peace, and hydropower generation. Hydrological models predict that deforestation of the upper reaches of the Niger watershed in the Guinean Forest region would result in a threefold increase in runoff even though that ecosystem occupies less than 5% of the entire watershed⁸. In West Africa, reliable hydrological flow regimes are crucial for regional peace. Over the past few years there have been disagreements over water between; Burkina Faso and Ghana, Senegal and Mauritania, Niger and Nigeria.⁹ Less predictable rainfall and the likelihood of increased frequency of extreme events magnifies the importance of the Guinean Forest as a regulator of the hydrological cycle.
• The Guinean Forests provides a plethora of non-timber forest products (NTFP) to local populations including up to 80% of animal household protein consumption, fuel, medicine, raw material for construction, honey, and a number of products for which there are emerging markets¹⁰.

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⁵ Togo is the country of origin for the largest ivory shipment ever seized in Malaysia. http://www.traffic.org/home/2013/9/9/customs-department-and-traffic-set-a-course-to-fight-illegal.html
⁶ USAID/WA excluded a focus on critical Sahelian ecosystems because that biome is within the Joint Planning Cell for the Sahel geographic area of focus. Furthermore, one of the recommendations from the PAD Concept review was that the ROECCR should narrow its focus.
• A recent study found that investing in adaptation in the Guinean Forest ecosystem would generate more simultaneous benefits in food security and biodiversity than in any other terrestrial ecosystem in West Africa.\(^1\)

Finally, maintaining the integrity of West Africa’s ecosystems, particularly coastal ecosystems and the Guinean Forest is of global importance because:

• The Guinean Forest, the most bio-diverse terrestrial ecosystem in West Africa, is one of the 25 richest and most threatened reservoirs of plant and animal life on Earth. It also has the highest mammal diversity of any biodiversity hotspot and is among the highest priorities for primate conservation. The Guinean Forest harbors some of the few remaining chimpanzee populations in the world.
• Thirteen percent of the world’s mangroves (2.4 million hectares) are found in 19 West African countries. Each hectare stores up to 1000 tons of carbon, more than three times as much as the average tropical rainforest.\(^2\)
• Mangroves play a crucial role in the life cycle of a myriad of marine crustacean and fish species and are critical habitat for globally endangered species (i.e. manatees, sea-turtles). The collapse of West Africa’s mangroves would have an impact on the Southeastern Atlantic fisheries and biodiversity.
• Coastal lagoon complexes found along the southern West African coastline play a fundamental role in household food security in several countries in the region (Benin, Ghana, Ivory Coast, Sierra Leone, and Nigeria).

### 1.3 Description of Project Activities

#### 1.3.1 Combat Wildlife trafficking

At a time when worldwide efforts in both source and recipient countries are making great strides to combat wildlife trafficking, West Africa has grown more attractive as a haven for poaching, transiting, and trafficking activities. WA-BiCC provides a timely opportunity to ensure that the rich cache of best practices, tools, models, and trainings that have proven to be effective across the rest of Africa and Asia can be contextualized and replicated across West Africa.

**Policy and Governance Activities**

i.  **Develop action plans for combating wildlife trafficking** - Assist ECOWAS to review existing models and Action Plans in West Africa to diagnose gaps and challenges, identify champions, and pinpoint the greatest potential for leakage.

ii.  **Strengthened wildlife protection policies and legal framework** - West Africa’s 19 countries are characterized by weak or nonexistent legal frameworks for poaching and trafficking, and judiciaries that are ill-equipped to enforce the law. Most urgent is the requirement for basic legislation in line with CITES and Lusaka Convention commitments

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**Capacity building activities to combat wildlife trafficking**

i. *Capacity building for enforcement and prosecution* - Support for USFWS planned regional training Center in Cameroon. USFWS will combat wildlife trafficking through an integrated capacity-building initiative based in Cameroon for select Central and West African countries.

ii. *National-level Trainings and Technical Assistance to Target Enforcement Gaps* - To achieve the Action Plan technical milestones, training in specialized investigation techniques to police, custom, and border patrol officials will be provided. To ensure capacity across the enforcement chain, specialized trainings for prosecutors and the judiciary will be held so they are prepared to apply national law and penalize perpetrators to the maximum extent possible. At the regional level, justice sector training will be coordinated through the ECOWAS Court of Justice. The project will explore the possibility of collaborating with other initiatives such as the West Africa Cooperative Security Initiative, or issuing targeted RFAs to establish specialized CITES units within customs in the region’s largest transit countries to provide increased expertise, time, and resources for the detection of illicit wildlife products and specimen identification.

iii. *Local-Level Capacity Building for Participation in Combatting Wildlife Crime.* - Provide grants to local and national NGOs and community-based organizations (CBOs) to test, implement, and train communities on practices for community participation in anti-poaching and anti-trafficking.

**Effective practices to combat wildlife trafficking**

i. *Develop and Strengthen Sustainable Enforcement Networks* - Capacity building and legitimacy of West African networks to a point of maturity where they can participate in global efforts. Support Anglophone and Francophone networks as they exist, while actively seeking to merge networks, and working through regional institutions to develop bilingual tools and resources.

ii. *Identifying and Mobilizing Local Networks* - At the local level, we will sponsor the development of technology-based alerts structures through SMS and other means that safeguard men, women and youth and allow safe avenues for their participation in assessing socio-cultural drivers and in site-based efforts to combat wildlife crime.

iii. *Increase availability of tools, data and information* - Through local institutions and partners, support broad dissemination of, and training in, widely accepted technologies and smart digital data solutions to combat wildlife trafficking, that have yet to make inroads in West Africa. Through seed grants, catalyze proof of concept for law enforcement technologies applicable to the West African context—affordable, open source, and replicable with potential to achieve scale through PPPs.

iv. *Smart Technologies to Strengthen Anti-Trafficking Efforts* - At the regional level, priorities include technologies that contribute to DNA analysis and sampling in underrepresented areas, and e-permitting for CITES-listed species to simplify transactions for customs authorities and reduce the potential for fraudulent paperwork.

v. *Mapping and Crowdsourcing to Monitor Transit Road Networks* - Through ECOWAS and MRU, support a rapid assessment of law enforcement requirements for maps.

**Promote effective journalism at the national level** - To demotivate potential poachers and increase awareness of the severity of crimes associated with poaching activities, PCI, in coordination with prospective grantees the EAGLE Network, will provide training and workshops using their proven results-based methodologies for journalists and CBOs to improve their ability to investigate and publicize illicit wildlife trafficking as a serious crime, as well as general training to these grantees in the effective use of media, new media, and materials.
Research relevant regional themes - Solicit research, digital data collection, publication, and media promotion on a series related to poaching and trafficking building on existing research and information, including 1) species-specific data that quantifies the impact of poaching and trafficking on animal populations; 2) economic analysis that quantifies the impact of poaching and trafficking on local and national economies and emphasizes the co-benefits of combatting wildlife trafficking and improved management of biodiversity habitat; and 3) data and analysis that links wildlife trafficking to issues of national and trans boundary security.

Promote behavioral change at the local level with education-entertainment strategy- support local-level outcomes with innovative, scalable, cost-effective, and proven entertainment-education and social marketing methodologies. Integrate anti-poaching and anti-trafficking themes into radio dramas and call-in shows broadcast in local languages throughout the region, as well as pop music campaigns to reach a broader audience. Sensitize communities on ways to support enforcement efforts and the benefits of doing so. Interested youth at the community level will be engaged and trained as local agents of behavior change.

1.3.2 Coastal resilience improved in West Africa

Policy and Governance Activities to improve coastal resilience

i. Developing a Regional Coastal Action Plan - The ECOWAS Regional and Sub-Regional Plans of Actions on Climate Change and Vulnerability provide a structure for the development of a Regional Coastal Action Plan (RCAP). Updating Regional Policy Frameworks to Incorporate Coastal Adaptation Consideration

ii. Support regional adaptation plan process - assist countries to undertake the National Adaptation Plan (NAP) process established under the Cancun Adaptation Framework (CAF).

iii. Engaging Regional Institutions in the NAP Process - build the process established for regional coordination on coastal NAP development by USAID’s CCRD project to jointly sponsor these efforts, as appropriate, with ECOWAS’ Climate Change Unit and Abidjan Convention Secretariat

iv. Accessing Financing for NAP Implementation - Provide technical assistance at the national level to build capacity for securing adaptation finance to fund NAP priorities, with particular focus on assisting national governments to address coastal adaptation priorities.

v. Translating the NAP into Action at the National and Local Level.

Capacity building activities to improve coastal resilience

i. Generate and utilize climate and geospatial information – capacity building to analyze climate data, develop climate projections, monitor risks, and communicate usable information to end users. CIESIN will build capacity to: strengthen the necessary information technology infrastructure; generate and manage its content; and develop and utilize decision support tools

ii. Regional User Profile and Information Gaps Assessment - lead a user profile and information gaps assessment to systematically review existing climate information and decision support tools in West Africa
iii. Developing Climate Information Products - assist national meteorological and hydrological services to elaborate information that is useful beyond the 24-hour forecast. Assist regional institutions (i.e., AGRHYMET which only covers the core Permanent Interstate Committee for Drought Control in the Sahel (CILSS) countries within their mandate, and national-level meteorological departments or regional academic institutions, such as Ghana Meteorological Service) in preparing a work plan and budget to develop and roll out a revised set of climate informational products

iv. Foundational Trainings to Address Climate Impacts on Coastal System - strengthen the capacity to anticipate, prevent, and manage natural disasters, including building upon and expanding existing systems such as FEWS NET, Malaria Early Warning System, SERVIR, and CLIM-WARN

EFFECTIVE PRACTICES TO IMPROVE COASTAL RESILIENCE

i. Implement intensive site based coastal adaptation activities - establish landscape-based operations with the goal of testing solutions, building evidence, and encouraging replication

ii. Assessing Vulnerability to Climate Change in the Target Landscape - conduct a site-specific climate change vulnerability assessment to provide decision makers and stakeholders alike with a snapshot of vulnerability at the landscape level

iii. Developing and Implementing Adaptation Options to Strengthen Resilience – develop within the target landscape four primary areas of intervention options: 1) planning and governance, 2) resilient infrastructure, 3) resilient livelihoods, and 4) biodiversity conservation

iv. Collecting and Documenting Best Practices in Sub-National Coastal Management - collect, document, and disseminate best practices throughout the region, and assist communities and countries to examine coastal adaptation options (best practices will be linked to relevant Component 3 activities

1.3.3 Deforestation, degradation and biodiversity loss reduced in key forests

i. Increase availability of access to information on best practice in mangrove and upland forest management - bridge the gap to pull up, synthesize, and communicate lessons so that they filter down through policy and into widespread practice.

ii. Reduce drivers of mangrove deforestation in key locations

iii. Strengthened policy to support improved environmental governance - review of regional and national environmental policies, improving national policies for environmental management.

iv. Build capacity for LEDS and REDD+ - review and examination of rights to benefits, capacity building for evaluating environmental and social soundness, establishing and piloting MRV systems, regional level economic planning and REDD+ strategy development

v. Strengthened capacity for private sector engagement in biodiversity habitat conservation and low emission development.

vi. Identify best practice in community forest management to support wildlife conservation.

vii. Improve policy and enabling environment for mangrove management

viii. Improve capacity for data and research in mangrove ecosystems

ix. Promote best practices in mangrove management, conservation and community based fisheries

Public-Private Partnerships

i. Identify the crossroads to meaningful opportunities for communities, private sector, and local government to develop viable partnership concepts.
ii. Develop socioeconomic analysis to support both private and public sector and community engagement through meaningful incentives.

iii. Make the business case to attract private sector partners and target companies that can further their business through a PPP.

iv. Make the social case to attract public sector support.

v. Make the socioeconomic case and provide guarantees to communities and vulnerable groups that rights are respected and benefits distributed equitably; and provide assistance to the communities and private/public partners to comply.

vi. Develop PPP compacts detailing buy-in and commitments.

The project’s approach calls for interventions at three levels: regional, national and local. Regional impact will be achieved by working with and through regional institutions that have a bearing on regional and national level policies and decision making; chief among them the Economic Community of West African States (ECOWAS), the Abidjan Convention, and the Mano River Union (MRU). The project will engage with regional technical and scientific organizations (CILSS, AGRHYMET, and ACMAD) as service and information providers to the three (regional) focus institutions, selected national level institutions, and in support of local level project interventions. When needed, and based on needs assessments, institutional strengthening support will be provided.

2. REGIONAL ENVIRONMENTAL LAWS AND POLICIES

2.1 Locations Affected

Ecologically the project will focus on two types of ecosystems: 1) The Guinean Forest; and 2) coastal ecosystems, particularly mangroves and coastal lagoons. Specific sites will be selected according to a set of criteria (see text box) through consultations, field inspections and a review of existing information. These ecosystems were selected because: 1) they are critical habitat to globally threatened species; 2) provide critical ecosystem services to the region and the world; and 3) their conservation is critical to the ability of West Africa to cope with future climate regimes and unusual climatic events. Furthermore, with few exceptions, coastal ecosystems have been hitherto neglected by the development assistance community.

Overview

West Africa covers an area larger than the continental United States and is comprised of several different biomes. Most of West Africa’s 300 million people have fragile livelihoods and few safety nets, with all but two of the 19 countries being at the very bottom of the Least Developed Countries list (based on GDP). West Africa’s population is predicted to grow faster than anywhere else in the world for the next 15-20 years.

Sites for local-level interventions must:

- Be Important to global biodiversity because: a) it has high levels of endemism; or b) serves as habitat for migratory species; or c) plays a critical role in the life cycle of a globally threatened species.
- Be under anthropogenic threat.
- Be vulnerable to climate change.
- Offers the opportunity for either climate mitigation or adaptation actions.
- Is located in an area and country where the ecological, logistical, social, and political milieu is conducive to implementation.
- Is in either the Guinean Forest or a coastal ecosystem.
- Is deemed important by the primary regional partners and national government.

13 The crucial socio-ecological importance of the Guinean Forest and coastal ecosystems in West Africa are outlined in the “Background” section.
putting increased pressure on natural and human systems. Climate change will likely increase flooding in coastal areas owing to sea level rise and an increase in extreme events. Temperatures are expected to increase by 2-3 degrees throughout the region. While predictions of rainfall are less certain, rainfall throughout West Africa is likely to become more variable with greater chance for droughts and floods, thus affecting agricultural productivity. Increasing climate variability associated with climate change will be a major challenge to economic growth and resilience.

In addition to climate change, West Africa’s natural and human systems, including its biodiversity, are at serious risk from anthropogenic stresses. Poor soils, lack of investment, and unclear land and resource tenure contribute to some of the lowest agricultural yields in the world, driving the conversion of more land and habitat to agricultural use. While there is debate on the cause and extent of deforestation in the region, there is clear evidence of loss of valuable forest resources through reduction of fallow (regeneration) time in farming cycles, unsustainable and often illegal logging, overharvesting of wildlife and poor management of tree crops. Fisheries throughout the region are being harvested unsustainably and are collapsing. Mangroves and other coastal resources remain virtually unmanaged. In addition, West Africa is a growing part of the expanding crisis of wildlife trafficking both as a transit area and a source for ivory, pets and other animal parts.

While most West African countries have legislation and policies aimed at natural resource governance, they are often ill equipped to implement, monitor and enforce those established laws and policies. In addition, many policy frameworks remain undeveloped. For instance, most countries in West Africa have developed National Adaptation Programs of Action but few have made significant progress on developing REDD+ Readiness plans, National Adaptation Plans (NAPs), or coastal development frameworks. Poor integration of government structures at a variety of levels—regional, national and local—often leads to confusing and contradictory policies, which acts as a disincentive for people to invest in improved resource management.

14 http://www.plosbiology.org/article/info%3Adoi%2F10.1371%2F journal.pbio.1000131
## 3.0 POTENTIAL ENVIRONMENTAL IMPACTS AND RECOMMENDED DETERMINATIONS INCLUDING CONDITIONS

### 1.0 COMBAT WILDLIFE TRAFFICKING

<table>
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<tr>
<th>Activity</th>
<th>Potential Adverse Environmental Impacts</th>
<th>Recommended Threshold Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regional action planning workshops</td>
<td>This activity will focus on reviewing existing models and action plans to diagnose gaps, challenges, identify champions and pinpoint potential for leakage. Through this process, a baseline will be established for policies and best practices for combating wildlife trafficking in West Africa. This activity is not likely to result in any significant adverse environmental and social impact.</td>
<td><strong>Categorical Exclusion</strong> is recommended per 22CFR216.2(c)(2)(i) for education, technical assistance or training programs except to the extent such programs include activities directly affecting the environment.</td>
</tr>
<tr>
<td>Support for national action planning</td>
<td>The focus of this activity will be to assist countries to use the wildlife and forest crime analytic toolkit as a framework to standardize efforts. Management and scientific capacities of national authorities will be built with support from USFS CITES authorities. No significant potential adverse environmental impacts anticipated.</td>
<td><strong>Categorical Exclusion</strong> is recommended per 22CFR216.2(c)(2)(xiv) studies, projects or programs intended to build the capacity of recipient countries to engage in development planning except to the extent designed to result in activities directly affecting the environment as construction of facilities.</td>
</tr>
<tr>
<td>Regional policy framework to support anti-trafficking</td>
<td>This activity will focus on providing analysis and technical assistance to regional entities as ECOWAS and MRU to assist them to synthesize, pull up and communicate successful efforts at the national level. No</td>
<td><strong>Categorical Exclusion</strong> is recommended per 22CFR216.2(c)(2)(i) for education, technical assistance or training programs except to the extent such programs include activities directly affecting the environment.</td>
</tr>
<tr>
<td><strong>Support national policy and legislation to meet CITES commitments.</strong></td>
<td><strong>No significant adverse environmental impacts anticipated from this policy strengthening effort which will mainly involve technical assistance and training.</strong></td>
<td><strong>Categorical Exclusion</strong> is recommended per 22CFR216.2(c)(2)(i) for education, technical assistance or training programs except to the extent such programs include activities directly affecting the environment.</td>
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**CAPACITY BUILDING ACTIVITIES TO COMBAT WILDLIFE TRAFFICKING**

<table>
<thead>
<tr>
<th><strong>Capacity building for regional training center in Cameroon</strong></th>
<th><strong>Activity will focus on integrated capacity building initiative for West and Central Africa to engage ministries, agencies and inter-agency structures to train a cadre of trainers on combating wildlife trafficking. No significant adverse environmental impacts are anticipated.</strong></th>
<th><strong>Categorical Exclusion</strong> is recommended per 22CFR216.2(c)(2)(i) for education, technical assistance or training programs except to the extent such programs include activities directly affecting the environment.</th>
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| **National level training and technical assistance to target enforcement gaps** | **Specialized investigative techniques to police, custom and border patrol officials on wildlife trafficking. Activity will also focus on capacity across the enforcement chain to include prosecutors and judiciary to help apply national laws to penalize perpetrators to the extent possible. No significant adverse environmental impacts are anticipated.** | **Categorical Exclusion** is recommended per 22CFR216.2(c)(2)(i) for education, technical assistance, or training programs except to the extent that such programs include activities directly affecting the environment. |
| Activity                                                                 | Potential Adverse Environmental Impacts                                                                                                                                                                                                                      | Recommended Threshold Determination                                                                                                                                                                                                                   |
|-------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------
| Local level capacity building for participation in combatting wildlife  | Activity will focus on providing grants to locals NGOs CBOs and FBOs to test, implement and train communities on practices for community participation in anti-poaching and anti-trafficking of wildlife. Grants will be provided for capacity building only. No significant adverse environmental impacts are anticipated.                     | Categorical Exclusion is recommended per 22CFR216.2(c)(2)(i) for education, technical assistance or training programs except to the extent such programs include activities directly affecting the environment.                                                                 |
| crime                                                                   |                                                                                                                                -------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|                                                                                                                                                                                                                                                     |
| **TOOLS AND PRACTICES TO COMBAT WILDLIFE TRAFFICKING**                  |                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                     |
| Activity                                                                 | Potential Adverse Environmental Impacts                                                                                                                                                                                                                      | Recommended Threshold Determination                                                                                                                                                                                                                  |
| Developing or strengthening regional networks                           | Activity involves capacity building of West African networks so they can participate in global efforts to combat wildlife trafficking. This activity involves capacity building through technical assistance and training only. No significant adverse environmental impacts anticipated.              | Categorical Exclusion is recommended in accordance with 22CFR216.2(c)(2)(i) for education, technical assistance, or training programs except to the extent that such programs include activities directly affecting the environment.                                                        |
| • Establishing and strengthening national networks                       |                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                     |
| • Identifying and mobilizing local networks                              |                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                     |
| • Smart technologies to strengthen anti-trafficking                      | Seed grants will be provided to test law enforcement technologies. These seed grants will not have a direct effect on the environment. They will mainly involve testing and promotion of smart technologies such as technologies that contribute to DNA analysis and sampling in underrepresented areas, and e-permitting for CITES-listed species to simplify transactions for customs authorities and reduce the potential for fraudulent paperwork.  | Categorical Exclusion is recommended in accordance with 22 CFR 216.2 (c)(2)(iii) for analyses, studies, academic or research workshops and meetings, and (v) Document and information transfers                                                                    |
| • Mapping and crowdsourcing to monitor transit road networks             | This involves analyses and studies to conduct a rapid assessment of law enforcement requirements for maps and will not result in significant adverse environmental effects.                                                                                            | Categorical Exclusion is recommended in accordance with 22 CFR 216.2(c)(2)(iii) for analyses, studies, academic or research workshops and meetings                                                                                                              |
1. Promote effective journalism at the national level
   - This involves training and workshops only and no significant adverse impacts are anticipated.
   - Categorical Exclusion is recommended per 22CFR216.2(c)(2)(i) for education, technical assistance, or training programs except to the extent that such programs include activities directly affecting the environment.

2. Research relevant regional themes
   - This activity will solicit research, digital data collection, publication, and media promotion on a series related to poaching and trafficking building on existing research and information. No adverse environmental impacts are anticipated.
   - Categorical Exclusion is recommended in accordance with 22CFR 216.2(c)(2)(iii) for analyses, studies, academic or research workshops and meetings; and 22 CFR 216.2(c)(2)(v) for document and information transfers.

3. Promote behavior change at the local level with education-entertainment strategy
   - This involves education, training, social marketing, and community sensitization.
   - Categorical Exclusion is recommended per 22CFR216.2(c)(2)(i) for education, technical assistance, or training programs except to the extent that such programs include activities directly affecting the environment.

2.0 COASTAL RESILIENCE IMPROVED IN WEST AFRICA

POLICY AND GOVERNMENTAL ACTIVITIES TO IMPROVE COASTAL RESILIENCE

<table>
<thead>
<tr>
<th>Activity</th>
<th>Potential Adverse Environmental Impacts</th>
<th>Recommended Threshold Determination</th>
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</thead>
<tbody>
<tr>
<td>• Developing a regional coastal action plan</td>
<td>This activity will focus on facilitating the development of a coastal RCAP that is ECOWAS led. The RCAP will focus on codifying best practices and common principles for coastal adaptation, promote the use of and dissemination of climate information services and vulnerability assessment methodologies. The activity involves facilitating workshops and</td>
<td>Categorical Exclusion is recommended per 22CFR216.2(c)(2)(i) for education, technical assistance, or training programs except to the extent that such programs include activities directly affecting the environment.</td>
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<tr>
<td>• Updating regional policy frameworks to incorporate coastal adaptation considerations</td>
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</table>
preparing documentation. No significant direct adverse environmental impacts anticipated.

- Engaging regional institutions in the NAP process
- Accessing finance for NAP implementation
- Translating the NAP into action at the national and local level

This activity will focus on maximizing the use of adaptation tools developed by ARCC, CCRD and other programs and will also garner support from NGOs and donor community for NAP implementation. It will not involve direct funding of NAP activities; if any activities may have an impact on the environment, the relevant national environmental regulations would apply.

**Categorical Exclusion** is recommended per 22CFR216.2(c)(2)(v) for document and information transfer and 22CFR216.2(c)(2)(xiv) studies, projects or programs intended to build the capacity of recipient countries to engage in development planning except to the extent designed to result in activities directly affecting the environment as construction of facilities.

### CAPACITY BUILDING ACTIVITIES TO IMPROVE COASTAL RESILIENCE

<table>
<thead>
<tr>
<th>Activity</th>
<th>Potential Adverse Environmental Impacts</th>
<th>Recommended Threshold Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regional user profile and information gap assessment</td>
<td>This activity will focus on reviewing existing climate information and decision support tools in West Africa, assisting ECOWAS to develop internal capacity to conduct climate vulnerability mapping and develop decision support tools to support sectoral policy frameworks. It will also involve capacity building to analyze climate data, develop climate projections, monitor risks, and communicate usable information to end users, strengthen the necessary information technology infrastructure; generate and manage its content; and develop and utilize decision support tools. These activities involve preparation of documents, training workshops, and development of tools to improve</td>
<td><strong>Categorical Exclusion</strong> is recommended per 22CFR216.2(c)(2)(i) for education, technical assistance, or training programs except to the extent that such programs include activities directly affecting the environment; 22CFR216.2(c)(2)(v) for document and information transfer and 22CFR216.2(c)(2)(xiv) studies, projects or programs intended to build the capacity of recipient countries to engage in development planning except to the extent designed to result in activities directly affecting the environment as construction of facilities</td>
</tr>
</tbody>
</table>
technology infrastructure. No significant direct adverse environmental impacts anticipated.

| Foundational Trainings to Address Climate Impacts on Coastal System | This activity involves technical assistance and training that seeks to strengthen the capacity to anticipate, prevent, and manage natural disasters, including building upon and expanding existing systems such as FEWS NET, Malaria Early Warning System, SERVIR, and CLIM-WARN. These systems will help disaster readiness and prediction capacity. This will have no significant direct adverse environmental impacts. |
| Categorical Exclusion is recommended per 22CFR216.2(c)(2)(i) for education, technical assistance, or training programs except to the extent that such programs include activities directly affecting the environment and 22CFR216.2(c)(2)(xiv) studies, projects or programs intended to build the capacity of recipient countries to engage in development planning except to the extent designed to result in activities directly affecting the environment as construction of facilities |

**EFFECTIVE PRACTICES TO IMPROVE COASTAL RESILIENCE**

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<tr>
<th>Activity</th>
<th>Potential Adverse Environmental Impacts</th>
<th>Recommended Threshold Determination</th>
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</thead>
<tbody>
<tr>
<td>Implement intensive site based coastal adaptation activities</td>
<td>The aim of this activity is to test practices that will increase resiliency to climate change. While these activities are expected to have positive environmental effects, negative impacts may result if best practices fail to be applied. Since the exact activities to be implemented are currently unknown and will be developed over the LOP, it is impossible to evaluate environmental impacts at this stage. However, it is likely that basic best practices (for example, for small-scale construction) will mitigate any negative effects.</td>
<td>Negative Determination in accordance with 22 CFR 216.3(a)(2)(iii). No significant adverse effects will result from these activities with implementation of the following condition: Each adaptation activity will be evaluated using the formal AFR subproject/subgrant review process as set out by the AFR Environmental Review Form (ERF) available at: <a href="http://www.usaidgems.org/compliance.htm">http://www.usaidgems.org/compliance.htm</a> adapted for WABiCC. This screening process will determine activity-specific impacts and mitigation measures. With best practices and project/site-specific mitigation measures, these activities are not expected to have significant adverse impacts. Determining activity-specific impacts and mitigation measures should be informed by the relevant sectoral guidance on the following sites:</td>
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<tr>
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<td>IFC Environmental, Health and Safety Guidelines: <a href="http://www.ifc.org/wps/wcm/connect/topics_ext_c">http://www.ifc.org/wps/wcm/connect/topics_ext_c</a></td>
</tr>
<tr>
<td>Activity</td>
<td>Description</td>
<td>Categorization</td>
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<tr>
<td>Assessing Vulnerability to Climate Change in the Target landscape</td>
<td>This activity will focus on conducting site based climate change vulnerability assessments to provide decision makers and stakeholders with a snapshot of vulnerability at the landscape level and in select sites. Key elements of this assessment will include resilient infrastructure, resilient livelihoods, biodiversity conservation and planning and governance. This will not involve funding of physical infrastructure or livelihood support for resilience.</td>
<td>Categorical Exclusion is recommended in accordance with 22CFR216.2(c)(2)(v) for document and information transfer and 22CFR216.2(c)(2)(xiv) studies, projects or programs intended to build the capacity of recipient countries to engage in development planning except to the extent designed to result in activities directly affecting the environment as construction of facilities</td>
</tr>
<tr>
<td>Developing and Implementing Adaptation Options to Strengthen Resilience</td>
<td>The aim of this activity is implement a range of options to increase resiliency to climate change. While these options are expected to have positive environmental effects, negative impacts may result if best practices fail to be applied. Since the exact activities to be implemented are currently unknown and will be developed over the LOP, it is impossible to evaluate environmental impacts at this stage. However, it is likely that basic best practices (for example, for small-scale construction and for community-based natural resource management) will mitigate any negative effects.</td>
<td>Negative Determination in accordance with 22 CFR 216.3(a)(2)(iii). No significant adverse effects will result from these activities with implementation of the following condition: Each adaptation activity will be evaluated using the formal AFR subproject/subgrant review process as set out by the AFR Environmental Review Form (ERF) available at: <a href="http://www.usaidgems.org/compliance.htm">http://www.usaidgems.org/compliance.htm</a> adapted for WABiCC. This screening process will determine activity-specific impacts and mitigation measures. With best practices and project/site-specific mitigation measures, these activities are not expected to have significant adverse impacts. Determining activity-specific impacts and mitigation measures should be informed by the relevant sectoral guidance on the following sites:</td>
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</table>
Documenting and disseminating best practices in sub-national coastal management:

- Peer to peer learning through coastal adaptation forums
- Coastal conservation forums
- Radio drama and call-in shows

No significant adverse environmental impacts anticipated

**Categorical Exclusion** is recommended per 22 CFR 216.2(c)(2)(i) for education, technical assistance or training programs except to the extent such programs include activities directly affecting the environment and 22 CFR 216.2(c)(2)(v) for document and information transfer.

### 3.0 DEFORESTATION, DEGRADATION, AND BIODIVERSITY LOSS REDUCED IN KEY FORESTS

<table>
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<tr>
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</table>
| Grants program  | Grants will be provided to implement activities that increase ecosystem resiliency to climate change. While grants are expected to have positive environmental effects, negative impacts may result if best practices fail to be applied. Since the exact activities to be implemented are currently unknown, it is impossible to evaluate environmental impacts. | **Negative Determination** in accordance with 22 CFR 216.3(a)(2)(iii). No significant adverse effects will result from grants with implementation of the following condition:

Each grant application will be evaluated using the formal AFR subproject/subgrant review process as set out by the AFR Environmental Review Form (ERF) available at:

[http://www.usaidgems.org/compliance.htm](http://www.usaidgems.org/compliance.htm) adapted for WABiCC. This screening process will determine activity- |
at this stage. Since the intent is to have positive effects on the environment, it is likely that basic best practices will mitigate any potential negative effects.

Determining activity-specific impacts and mitigation measures should be informed by the relevant sectoral guidance on the following sites:

- **USAID Sector Environmental Guidelines:** [http://www.usaidgems.org/sectorGuidelines.htm](http://www.usaidgems.org/sectorGuidelines.htm)
- **ENCAP Environmental Guidelines for Small-Scale Activities in Africa (for Community Based Natural Resource Management):** [http://www.encapafrica.org/egssaa.htm](http://www.encapafrica.org/egssaa.htm)

Improving uptake of best practices through a trainer of trainers approach:

- Increase availability of access to information on best practice in mangrove and upland forest management - bridge the gap to pull up, synthesize, and communicate lessons so that they filter down through policy and into widespread practice.
- Reduce drivers of mangrove deforestation in key locations

These capacity building activities are aimed at strengthening knowledge of those working in the natural resources and climate change sectors to engage in climate change adaptation and conservation activities. No significant adverse environmental impacts are anticipated.

**Negative Determination** in accordance with 22 CFR 216.3(a)(2)(iii). No significant adverse effects will result from grants with implementation of the following conditions:

1) Training and capacity building activities must promote principles of community-based natural resource management (CBNRM) or international best practices to promote local stewardship of natural resources to improve management of local resources. The key training principles and processes should align with host-country, regional entities, and international recognized standards and best practices for natural resource management and anti-wildlife trafficking. Further, the trainings and capacity building must be inclusive of stakeholders who may be impacted by NRM, including resource users, vulnerable peoples, and indigenous peoples, among others. BMPs must be consistent with the principles of environmental management as detailed
<table>
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<tr>
<th>Improving national policies for environmental management:</th>
<th>This involves technical assistance, meetings, and analyses to strengthen target environmental policies and legislation. The aim of this activity is to improve the policy environment for environmental management and no significant adverse impacts are anticipated.</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Strengthened policy to support improved environmental governance - review of regional and national environmental policies, improving national</td>
<td><strong>Negative Determination</strong> in accordance with 22 CFR 216.3(a)(2)(iii). No significant adverse effects will result from grants with implementation of the following conditions:</td>
</tr>
<tr>
<td></td>
<td>1) Policy development must integrate or otherwise reflect current data and analysis on regional environmental trends, including principles of sustainable NRM and GCC adaptation strategies. Data and analysis may be drawn from USAID, other bilateral donor agencies, International</td>
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<td>2) Improved forestry management activities shall integrate best management practices (BMPs) reflecting local forestry ecosystem services as well as native species composition, climate, soil, and hydrology in order to maximize sustainable outcomes. BMPs must be consistent with the principles of environmental management as detailed in the USAID Sector Environmental Guideline for Forestry.</td>
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<td>3) Technical assistance which introduces the use of new equipment or harvesting techniques must be evaluated and analyzed for their potential to generate shifts in ecosystem function and services.</td>
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<td></td>
<td>4) Improved mangrove management and fisheries activities shall integrate BMPs reflecting local ecosystem services as well as native species composition, hydrology, and local fishing regulations, patterns and data. BMPs must be consistent with the principles of environmental management as detailed in the USAID Sector Environmental Guideline for Fisheries.</td>
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<td></td>
<td>5) LEDS and REDD+ development strategies must align with internationally recognized development standards and best practices as well as host-country and regional goals and needs.</td>
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</table>
policies for environmental management.
- Improve policy and enabling environment for mangrove management

Financial Institutions, Multilateral Development Banks, or other internationally recognized research or development entities.

2) In instances where policies impact natural resources (including wildlife) of a transboundary nature, these policies must be developed in coordination with both applicable regional entities and relevant host country institutions.

### 4.0 Public Private Partnerships

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<tr>
<th>Activity</th>
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</table>
| - Identify the crossroads to meaningful opportunities for communities, private sector, and local government to develop viable partnership concepts  
- Develop socioeconomic analysis to support both private and public sector and community engagement through meaningful incentives.  
- Make the business case to attract private sector partners and target companies that can further their business through a PPP.  
- Make the social case to attract public sector support. | No significant adverse direct environmental impacts are anticipated from these activities to lay the groundwork for PPP interventions. These activities involve only meetings and workshops and analyses and preparation of reports/studies. | **Categorical Exclusion** is recommended in accordance with 22CFR216.2(c)(2)(iii) for analyses, studies, academic or research workshops and meetings and 22CFR216.2(c)(2)(v) for document and information transfer. |
Make the socioeconomic case and provide guarantees to communities and vulnerable groups that rights are respected and benefits distributed equitably; and provide assistance to the communities and private/public partners to comply.

Develop PPP compacts detailing buy-in and commitments.

At this stage, PPP concepts have yet to be developed, and therefore, evaluating the site and activity-specific environmental impacts of implementation of PPPs is currently impossible. Given that PPPs will be aimed at reducing deforestation, ecosystem degradation, and biodiversity loss, PPPs are unlikely to have significant adverse environmental impacts. However, to ensure this is the case, environmental impacts of each PPP will have to be evaluated prior to supporting a PPP.

**Negative Determination** in accordance with 22 CFR 216.3(a)(2)(iii). No significant adverse effects will result from PPPs with implementation of the following condition:

Each PPP will be evaluated using the formal AFR subproject/subgrant review process as set out by the AFR Environmental Review Form (ERF) available at: [http://www.usaidgems.org/compliance.htm](http://www.usaidgems.org/compliance.htm) adapted for WABiCC. This screening process will determine activity-specific impacts and mitigation measures. With best practices and project/site-specific mitigation measures, PPPs are not expected to have significant adverse impacts.

Determining activity-specific impacts and mitigation measures should be informed by the relevant sectoral guidance on the following sites:

- **ENCAP Environmental Guidelines for Small-Scale Activities in Africa (for Community Based Natural**
Resource Management:
http://www.encapafrica.org/egssaa.htm
4.0 General Implementation & Monitoring Requirements

In addition to the conditions established in Section 3.0, full implementation of this IEE is contingent on the following general monitoring and implementation requirements:

1. **IP Briefings on Environmental Compliance Responsibilities.** The WA-BiCC team overseeing this NRM program shall provide the Implementing Partner (hereinafter IP), with a copy of this IEE; the IP shall be briefed on their environmental compliance responsibilities by their cognizant AOR with support from the MEO and REA as appropriate.

2. **For small grants and sub-grants programs,** introduce / adapt the formal USAID AFR subproject / subgrant environmental review process, using the AFR Environmental Review Form (ERF, available at [http://www.usaidgems.org/compliance.htm](http://www.usaidgems.org/compliance.htm)), and Environmental Review Report (ERR). The ERF must be completed and approved prior to construction or rehabilitation of each site/system. The ERF must specifically address the potential impacts identified in the above analysis of this activity.

3. **Development of EMMP.** Each IP whose activities are subject to one or more conditions set out in section 3 of this IEE 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 IP shall assure that IEE conditions that apply to activities supported under subcontracts and sub-grants are implemented. (In the case of large sub-grants or subcontracts, the IP may elect to require the sub-grantee/subcontractor to develop their own EMMP.)


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

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

5. **Integration of compliance responsibilities in prime and sub-contracts and grant agreements.**
   a. IPs shall assure that future sub-contracts and sub-grant agreements, and/or significant modifications to existing agreements, reference and require compliance with relevant elements of these conditions.

6. **Assurance of sub-grantee and sub-contractor capacity and compliance.** IPs shall assure that sub-grantees and subcontractors have the capability to implement the relevant requirements of this IEE. The IP shall, as and if appropriate, provide training to sub-grantees and subcontractors in their environmental compliance responsibilities and in environmentally sound design and management (ESDM) of their activities.
7. **WA-BiCC team monitoring responsibility.** As required by ADS 204.5.4, the WA-BiCC team will actively monitor and evaluate whether any conditions of this IEE, as amended, are being implemented effectively and whether there are new or unforeseen consequences arising during implementation that were not identified and reviewed in this IEE.

If new or unforeseen consequences arise during implementation, the team will suspend the activity and initiate appropriate, further review in accordance with 22 CFR 216. USAID Monitoring shall include regular site visits.

8. **New or modified activities.** As part of its Work Plan, and all Annual Work Plans thereafter, IPs, in collaboration with their C/AOR, shall review all ongoing 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 WA-BiCC 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 and approved.

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