1. Background and Project Description

1.1. Purpose and Scope of IEE

This IEE provides a preliminary analysis of the environmental impact of the proposed activities and corresponding environmental threshold determinations under the scope of the Social Cohesion and Reconciliation Program (SCORE). This IEE will cover grants to provide assistance to vulnerable populations such as early recovery assistance, i.e. livelihood and other income generation activities, training and technical assistance provided under this program.
1.2 Project Overview

The aim of the SCORE is to strengthen Sri Lankan-led efforts to build a more inclusive, cooperative and resilient society. For the purpose of this program, SCORE is defined as a process of building shared values and communities of interpretation, reducing disparities in wealth and income, and generally enabling people to have a sense that they are engaged in a common goal, facing shared challenges, and that they are members of the same community. Vulnerable populations to be supported in this program include, but are not limited to, persons with disabilities, war widows, single headed households, ex-combatants, IDPs, survivors of gender based violence, LGBT persons, and communities affected or vulnerable to extremist violence.

1.3 Project Description

The goal of the SCORE is to strengthen Sri Lankan efforts to build a more inclusive and resilient society. The activity will engage mainstream and marginalized communities and state and non-state institutions across Sri Lanka in support of the following three objectives.

Objective 1: To promote a cohesive Sri Lankan identity that embraces diversity and unity among all segments of the population through:

1.1 Increased intra- and inter-communal opportunities for diverse groups to engage on issues of mutual interest
1.2 Improved government institutions and processes promoting social cohesion and reconciliation
1.3 Strengthened role of religious and community leaders, institutions and communities in advancing reconciliation
1.4 Strengthened capacities of civil society organizations (CSOs) to effectively engage in reconciliation processes
1.5 Increased meaningful participation of women and youth in peacebuilding processes reconciliation processes

Objective 2: To minimize social disparities and exclusion through initiatives that address the needs of marginalized and vulnerable communities through:

2.1 Reduced social barriers affecting vulnerable populations
2.2 Strengthened social protections and sustainable livelihood opportunities for vulnerable populations
2.3 Strengthened capacities of local service providers to understand and meet the needs of vulnerable populations

Objective 3: To enhance support channels and networks for youth as a positive force for reconciliation and development in Sri Lanka

3.1 Strengthened opportunities for youth leadership and participation in community development
3.2 Improved nationwide youth networks and opportunities for exchange
**Objective 1: To promote a cohesive Sri Lankan identity that embraces diversity and unity among all segments of the population**

1.1 Increased intra- and inter-communal opportunities for diverse groups to engage on issues of mutual interest through:
- Sub-grants to local organizations to engage in community dialogue sessions, community consultation and mobilization on ethnic and religious harmony

1.2 Improved government institutions and processes promoting social cohesion and reconciliation through:
- Demand-driven technical assistance to key ministries and offices to support management, planning, operations, and outreach functions
- Support for community consultations and feedback loops
- Study tours/exposure visits on reconciliation practices in the region
- Leverage efforts of public servants that demonstrate best practices and successes of social harmony and inclusion
- Support the Ministry of National Dialogue on government plans in promoting the Official Languages Policy and implementation

1.3 Strengthened role of religious and community leaders, institutions and communities in advancing reconciliation

1.4 Strengthened capacities of civil society organizations (CSOs) to effectively engage in reconciliation processes through:
- Sub-grants to CSOs to strengthen participation in reconciliation processes, promote networking, and community engagement
- Technical training and capacity building on conflict sensitivity and conflict mediation
- Support for social surveys and other research initiatives to strengthen community-level reconciliation activities and evidence-based policy making
- Support for public awareness campaigns and advocacy initiatives promoting social cohesion and reconciliation

1.5 Increased meaningful participation of women and youth in peacebuilding processes

**Objective 2: To minimize social disparities and exclusion through initiatives that address the needs of marginalized and vulnerable communities**

2.1 Reduced social barriers affecting vulnerable populations through:
- Support for applied research that addresses social exclusion of vulnerable populations
- Community awareness and sensitization campaigns to reduce social stigma

2.2 Strengthened social protections and sustainable livelihood opportunities for vulnerable populations through:
- Improved access of vulnerable populations to available social protection programs
- Support for implementation and monitoring of social protection legislation
- Livelihoods support for resettled IDPs

2.3 Strengthened capacities of local service providers to understand and meet the needs of vulnerable populations through:
- Sub-grants to local organizations to serve the most marginalized communities
- Technical training to government and non-governmental community-based service providers
- Inter-community exchanges and initiatives to replicate best practices
Objective 3: Enhanced support channels and networks for youth as a positive force for reconciliation and development in Sri Lanka

3.1 Strengthened opportunities for youth leadership and participation in community development through:
- Support for extra-curricular civic education programs
- Training for civil society organizations and community-based organizations on youth outreach and engagement
- Support for a cadre of young leaders and community role models

3.2 Improved nationwide youth networks and opportunities for exchange through:
- Financial and technical assistance to local organizations that manage youth programs and networks promoting youth leadership and social empowerment
- Support for inter-cultural youth exchanges around issues of common interest
- Capacity building of national level institutions, such as the Ministry of Youth, and programs that promote youth leadership and social empowerment

2. Baseline Environmental Information

2.1. Locations Affected and Environmental Context
The mission’s Tropical Forest and Biodiversity analysis, and the Climate Resilience analysis performed at the CDCS and sector level informed the mission that current and planned activities have a low risk for environment and climate impact. Activities for this program will be implemented nationwide in areas of highest need and impact; these areas are yet to be determined.

The majority of planned activities for this program have a categorical exclusion determination. An EMMP will be developed for livelihood activities once the geographic area for implementation is determine. A climate risk analysis (at the activity level) will also be performed at this time and adaptation and mitigation measures will be included in the EMMP as appropriate.

2.2. Description of Applicable Environmental and Natural Resource Legal Requirements Policies, Laws, and Regulations
A Tropical Forest and Biodiversity Analysis (F118/119) was prepared in March 2016, as part of the Mission’s CDCS programming for 2017-2019. The analysis outlines the environmental, and natural resource legal requirements, policies, laws and regulations that focus on conservation and are not directly linked to the objectives and activities identified under this program.

2.3. Country/Ministry/Municipality Environmental Capacity Analysis
In order to carry out the proposed activities the future implementing partner (IP) will work with government ministries such as Ministry of National Coexistence, Dialogue and Official languages and other related special offices appointed by the parliament to promote reconciliation in Sri Lanka in implementing the national reconciliation strategy. In addition, the IP will work with various civil society groups, non-governmental organizations, and private sector institutes in supporting this objective.

2.4. Climate Change Vulnerability Analysis + Eco-systems services
Activities for this program will be implemented nationwide in areas of highest need and impact, theses areas are yet to be determined. A climate risk analysis (at the activity level) will be performed once the geographic area for implementation is determined and adaptation and mitigation measures will be included in the EMMP as appropriate.
3. Analysis of Potential Environmental and Social Impacts

The activities under the SCORE activity will aim to strengthen Sri Lankan efforts to build a more inclusive, cooperative, and resilient society through initiatives that foster social cohesion, advance reconciliation processes, and support the needs of vulnerable communities. The proposed activities under strengthened social protections and sustainable livelihood opportunities for vulnerable populations may have an impact on the environment. For example, the proposed livelihood activities include small-scale agriculture (home gardens), livestock farming (poultry) and other cottage industries such as reed productions, tailoring, and pottery and small scale finishing.

3.1. Objective 1: To promote a cohesive Sri Lankan identity that embraces diversity and unity among all segments of the population.

<table>
<thead>
<tr>
<th>Defined/Illustrative Activities</th>
<th>Potential Impacts</th>
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<tbody>
<tr>
<td>• Sub-grants to local organizations to strengthen community participation in reconciliation and social cohesion processes, technical assistance to key ministries and offices to support management, planning, operations, and outreach functions, study tours/exposure visits on reconciliation practices in the region, training to strengthened role of religious and community leaders, institutions and communities in advancing reconciliation, support for social surveys and other research initiatives to strengthen community-level reconciliation activities and evidence-based policymaking, support for public awareness campaigns and advocacy initiatives promoting social cohesion and reconciliation</td>
<td>These activities will not have an effect on the natural or physical environment and can be considered for a Categorical Exclusion Determination under §216.2(c)(2)(i) Education, technical assistance, or training programs.</td>
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Objective 2: To minimize social disparities and exclusion through initiatives that address the needs of marginalized and vulnerable communities

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<th>Defined/Illustrative Activities</th>
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<td>• Support for applied research that addresses social exclusion of vulnerable populations, community awareness and sensitization campaigns to reduce social stigma, support for implementation and monitoring of social protection legislation, improved access of vulnerable populations to available social protection programs</td>
<td>These activities will not have an effect on the natural or physical environment and can be considered for a Categorical Exclusion Determination under §216.2(c)(2)(i) Education, technical assistance, or training programs.</td>
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<td>Potential Impacts</td>
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<tr>
<td>2.2 Small Scale livelihoods support for resettled IDPs (10% from the TEC is allocated for this activity)</td>
<td>Generally, the following set of adverse environmental impacts may occur as a result of small-scale agriculture activities, particularly as the collective scale of household/smallholder activity grows. Specifically, support for small-scale sustainable agriculture activities including training in soil and water conservation and sustainable agricultural techniques and irrigation provision may result in: Increased land under cultivation, potentially pushing subsistence agriculture into more marginal/fragile/sensitive lands. Increased use of pesticides and fertilizers, including manures. Incorrectly applied, these inputs can migrate from a farmer’s field to local water sources, adversely affecting water quality, human health, livestock, and ecosystems. Beyond water contamination, misuse of pesticides can present significant health risks to farmers, their families and to consumers of the produce. Household risks are particularly high when the cultivated area is directed adjacent to the household (e.g. the kitchen garden model.) Raw manures are also a significant health risk to farmers and consumers, serving as a vector for oral-fecal route diseases. Soil erosion and/or fertility loss due to poor cultivation, soil management practices, and crop choices.</td>
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</tbody>
</table>
Poorly managed irrigation can result in permanent loss of soil fertility (salinization) and increased risks of ground and surface water contamination. In addition, increases in irrigated agriculture places additional demands on water resources, increasing the likelihood of overdraw and water resource depletion prevention and control of adverse impacts requires that design and management of irrigation schemes, including choice of crop types, be closely matched to local condition assumptions. Appropriate consideration must be given to changes in future water availability resulting from climate change.

5. Development of small-scale irrigation systems larger than “kitchen garden” schemes are NOT authorized unless and until the MEO reviews and approves a technical proposal, including siting, design and operating plan, for the proposed system. Upon review of the technical proposal, the REA may determine that more detailed environmental review is indicated and require completion of the environmental screening process, or an amendment to this SIEE. A separate technical proposal must be submitted for each substantially different irrigation scheme.

<table>
<thead>
<tr>
<th>Livestock farming: Poultry and goat rearing</th>
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<tbody>
<tr>
<td>Generally, the following set of adverse environmental impacts may result in the following types of activities, particularly as the collective scale of Small scale livestock farming:</td>
<td>The implementing partner and local organizations will adhere to good-practices guidelines for dairy and agriculture farming consistent with USAID’s environmental guidelines for small-scale activities (refer to agriculture and livestock sector guidelines) <a href="http://www.usaidgems.org/Documents/SectorGuidelines/Livestock">http://www.usaidgems.org/Documents/SectorGuidelines/Livestock</a></td>
</tr>
<tr>
<td>Land degradation, chicken manure, especially when worked into the ground, improves soil structure, and provides nutrients for plants however over fertilizing harms plants and can result in contaminated runoff</td>
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<td>Contamination of drinking water sources, runoff from areas with chicken manure and waste contaminate both surface water and groundwater, which are sources of drinking water.</td>
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<td>Habitat damage due to overgrazing.</td>
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<tr>
<td>Beneficiary-owned animals contracting diseases from other free-grazing animals.</td>
<td>Negative Determination with Conditions</td>
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<tr>
<th>Fishing Livelihoods</th>
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<tr>
<td>A set of adverse environmental impacts may result from small-scale fisheries activities, particularly as the collective scale of smallholder activity grows: Over-harvesting, unsustainable fishing practices are may result in over-capacity of the fishing fleet and cause over-harvesting</td>
<td>Exclusion from protected/sensitive areas, fishing will not take place in protected areas and should avoid spawning grounds. Motorized vessel use will be excluded from shallow-water habitats to minimize</td>
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<tr>
<td>Regulations around fisheries, the fishing activities supported by equipment provided under this program will be consistent with Sri Lankan regulations on fisheries, fisheries management, and operations.</td>
<td>Negative Determination with Conditions</td>
</tr>
</tbody>
</table>
of the target species and by-catch (see below). This has the tendency to lead to a cycle of fishing down the food web to lower-value species and continued over-harvesting.

By-catch, the use of some types of fishing equipment and practices (e.g., purse seine fishing nets, other fishing nets with small mesh size, and drift netting) can result in capture of non-target species or size groups (the by-catch). By-catch can cause population depletion of the non-target species or of the target species if too many juveniles are caught. This could lead to the decline of both the targeted fisheries and other fish species.

Use of poisons and dynamites. Toxic substances, such as cyanide, and techniques like dynamiting and electrocution are used to more easily harvest fish. Dynamite fishing, which is known to occur in parts of Sri Lanka, damages habitats, especially coral reefs, can maim anglers, and has caused fisheries to decline in some areas. Especially coral reefs, and has caused fisheries to decline in some areas.

Good-practice design and operation standards must be implemented for fisheries activities, generally consistent with USAID's environmental guidelines for small-scale activities (refer to fisheries sector guidelines).

http://www.usaidgems.org/Documents/SectorGuidelines/fisheries

The EMMP must include the following:

1) The establishment of no wake zones and no dumping (of oil or waste) and discharge zones
2) Exclusion of the use of nets against regulations and with banned mesh sizes
3) Exclusion of the use of by these toxic substances (e.g., cyanide) and dynamites electrocution;
4) The establishment of size limits of allowable catch consistent with sustainable fishing practices;
5) Exclusion of the catch of threatened, endangered, or protected species

4.2 Recommended Environmental Determinations: Grants Program: Negative Determination with Conditions

**Categorical Exclusions:**

A categorical exclusion is recommended for all activities under objective 1, activities 2.1 and 2.3 under objective 2 and all activities under objective 3 under §216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.).

**Negative Determination with Conditions:**

A negative determination with conditions is recommended for activity 2.2 under objective 2. Specific terms and conditions for these activities are presented below in Section 4.3.

10
4.3 Terms and Conditions

4.3.1 An activity specific EMMP (in the format indicated in Annex I) will be used, since this is a small scale project with similar construction models replicated in multiple sites that have a largely similar context. Prior to the start of an activity, the relevant activity-specific EMMP shall be reviewed by the Implementing Partner (IP) and approved by the Agreement Officer’s Representative (AOR) with the Mission Environmental Officer (MEO) as needed for suitability, adequacy, and comprehensive inclusion of necessary environmental, health and safety safeguards. The EMMP shall be attached to the signed Certification of No Adverse or Significant Effects on the Environment (See IEE Annex 2) and sent by the implementer to the AOR for his or her records and copied to the Mission Environmental Officer (MEO). After the IP has completed the activities for each EMMP, the IP shall sign a Record of Compliance with the EMMP (see IEE Annex 3) certifying that the organization met all applicable EMMP conditions and submit it to the AOR. The AOR shall keep all EMMPs and related environmental documentation for the project files and provide a copy to the MEO.

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

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

4.3.4 EMMPs shall stipulate for water testing to meet USG standards in annual work plans, and therefore budgeted for and reviewed for adequacy at least annually.

4.3.5 Climate risk screening at the activity level will be conducted prior to start of an activity, and a mitigation and adaptation measures shall be included in the EMMP, and reviewed for adequacy at least annually.

4.4 USAID Monitoring and Reporting

4.4.1 ALL IEE approved conditioned shall be fully transposed into the solicitation and award. At the “post-award” conference, AOR together with the MEO shall explain all IEE approved condition.

4.4.2 The AOR, with the support of the MEO, is responsible for monitoring compliance of Activities by means of desktop reviews and site visit reviews and site visits.

4.4.3 At any time the project is found to be out of compliance with the IEE, the AOR thru the MEO shall immediately notify the BEO.

4.4.4 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.

4.4.5 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 The IP shall have sufficient technical and financial capabilities to implement all approved conditions. If an individual activity is found to pose significant adverse environmental effects that have not been identified and addressed in the attached EMMP(s), or EMMPs that were subsequently approved for the project, new EMMPs shall be developed to include environmental safeguards for such effects.

4.5.2 IPs shall report on environmental compliance requirements as part of their routine project reporting to USAID. This will be reported in the quarterly progress reports submitted by the IP.
5  Mandatory Inclusion of Requirements in Solicitations, Awards, Budgets and Workplans

5.1 Appropriate environmental compliance language, including conditions, limitations and stipulation for revisions 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.

The USAID Mission will include an indicator for environmental compliance as part of the project’s performance monitoring plan. At the post-award conference, the AOR together with the MEO will explain to the IP all approved environmental conditions.

6. Limitations of the IEE: This IEE does not cover the following activities:
- Assistance for the procurement (including payment in kind, donations, guarantees of credit), use (including handling, transport, fuel for transport, storage, mixing, loading, application, clean-up of spray equipment, and disposal), or both, of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials—pesticides cover all insecticides, fungicides, rodenticides, etc. covered under the Federal Insecticide, Fungicide, and Rodenticide Act; and/or
- Procurement or use genetically modified organisms
- Procurement of use of non-native potentially invasive species
- Procurement or use of lead, asbestos, and for mercury containing materials and of any toxic and/or hazardous substances prohibited and/or banned by the national legislation and/or under the ratified international environmental and related conventions and agreements

The addition of any of the above mentioned activities would require a Bureau Environmental Officer (BEO) approved amendment.

7. Revisions

Under §216.3(a) (9), if new information becomes available that indicates that activities covered by the categorical exclusion might be considered major and their effect significant, or if additional activities are proposed that might be considered major and their effect significant, this categorical
### IEE ANNEX 1 - Environmental Mitigation and Monitoring Plan (EMMP) for SCORE under DCN: [provide DCN of IEE/EA]

<table>
<thead>
<tr>
<th>Activity</th>
<th>Identified Environmental Aspects or Impacts</th>
<th>Mitigation Measure(s)</th>
<th>Monitoring Indicator(s)</th>
<th>Monitoring and Reporting Frequency</th>
<th>Party(ies) Responsible</th>
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<tr>
<td>Planning and Design (if applicable)</td>
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<td>Mobilization (if applicable)</td>
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<td>Sourcing of Materials &amp; Equipment (if applicable)</td>
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<td>Rehabilitation works (if applicable)</td>
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<td>Construction Demobilization (if applicable)</td>
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<td>Testing, Operation, and Maintenance (if applicable)</td>
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Prepared by: ___________________________ Date: ________________

Cleared by: ___________________________ Date: ________________

Approved by: ___________________________ Date: ________________
IEE ANNEX 3
Record of Compliance with Environmental Mitigation and Monitoring Plans (EMMPs)
[Template]

Subject: [Site Names/Primary Project Name/IEE DCN Number]
To: [Name], COR/AOR/Activity Manager
Copy: [Name], Mission Environmental Office
Date:

The [name of the implementing organization] has finalized its activities at the [site names] to [describe activities that were undertaken]. This memorandum is to certify that our organization has met all conditions of the EMMP for this site activity. A summary of the how mitigation and monitoring requirements were met is provided below.

1. Mobilization and Site Preparation
2. Site Activity Implementation Phase
3. Site Closure Phase
4. Site Activity Handover

Sincerely,

[Name], Chief of Party
[Name of Implementing Partner Organization]

Approved:

[Name], AOR/COR/Activity Manager

Date

Copy to:
MEO
Bureau Environmental Officer
5. Environmental Threshold Decision Clearances

Drafted by: Rehana Cutilan, Project Management Specialist

Approval: Elizabeth Davnie-Easton
Acting Mission Director
Date: 10/19/2016

Clearance: Elizabeth Davnie-Easton, Office Director
Program Policy Support Office
Date: 10/19/2016

Clearance: Aleena Tinsley
Acting Office Director
Governance and Vulnerable populations (GVP)
Date: 10/18/2016

Clearance: Nihalini Riza Mission Environmental Officer/
Susan Gonzalez, Deputy Mission Environmental Officer
Date: 10/18/2016

Clearance: By email
Andre Balanik Regional Environmental Advisor
Date: 10/18/2016

Concurrence: William Gibson
Bureau Environmental Officer
Date: October 19, 2016

Distribution:
IEE File
MEO (to also provide a copy to AOR/COR)
RLA
OAA