**Program/Project/Activity Data:**

<table>
<thead>
<tr>
<th>Activity/Project Title: Let Girls Learn Malawi</th>
<th>Solicitation #: BAA-WW-LGL-2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contract/Award Number (if known): AID-OAA-A-17-00003</td>
<td></td>
</tr>
<tr>
<td>Geographic Location: Malawi</td>
<td></td>
</tr>
<tr>
<td>Originating Bureau/Office: Bureau for Economic Growth, Education &amp; Environment (E3)</td>
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</tr>
<tr>
<td>Supplemental IEE: □ Yes □ No</td>
<td>DCN and date of Original document: E3-17-17</td>
</tr>
<tr>
<td>Amendment: □ Yes □ No</td>
<td>DCN and ECD link(s) of Amendment(s):</td>
</tr>
<tr>
<td>Programmatic IEE: □ Yes □ No</td>
<td>Amendment No.:</td>
</tr>
<tr>
<td>Funding Amount: $ 10.5 million</td>
<td>Life of Project Amount: $ 10.5 million</td>
</tr>
<tr>
<td>Implementation Start/End: FY-FY 12/15/2016 to 12/14/2021</td>
<td></td>
</tr>
<tr>
<td>Expiration Date (if any):</td>
<td>Reporting due dates (if any): [exact dates] or frequency</td>
</tr>
<tr>
<td>Environmental Media and/or Human Health Potentially Impacted (check all that apply):</td>
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<tr>
<td>None □ Air □ Water □ Land □ Biodiversity □ Human Health □ Other □</td>
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<tr>
<td>Recommended Threshold Determination:</td>
<td></td>
</tr>
<tr>
<td>□ Negative Determination □ with conditions</td>
<td>□ Deferral</td>
</tr>
<tr>
<td>□ Categorical Exclusion</td>
<td>□ Exemption</td>
</tr>
<tr>
<td>□ Positive Determination</td>
<td>□ USG Domestic NEPA action</td>
</tr>
<tr>
<td>Climate Change:</td>
<td></td>
</tr>
<tr>
<td>□ GCC/Adaption □ GCC/Mitigation □ Climate Change Vulnerability Analysis (included)</td>
<td></td>
</tr>
</tbody>
</table>

**Adaptation/Mitigation Measure Deferral:** The only non-categorically excluded activity, construction, must have a climate change analysis drafted as part of its Environment Impact Evaluation once further details of the activity become available. The details of the analysis will then be amended to this IEE, including completion of the Climate Risk Matrix for Activities (Annex A).
SUMMARY OF FINDINGS:
The purpose of this document is to review the activities that will be undertaken by the Let Girls Learn project and their potential environmental impacts. The project Initial Environmental Examination (IEE) evaluates the potential impacts of the proposed activities and has determined that a Categorical Exclusion is appropriate for all activities with the exception of dormitory and school construction, which is deferred as the details are not yet available to allow for meaningful analysis of potential environmental impacts and mitigation planning for these activities. All construction actions, with the exception of the completion of an associated Environment Impact Evaluation, will require further environmental analysis and amendment of this IEE.

Background and Project/Activity Description
USAID’s primary focus in the Country Development Cooperation Strategy 2013-2018 is promoting Malawi’s self-reliance and economic development, which will lead to increases in the quality of essential services. Education is the foundation to social, economic and political development; a productive, educated human resource base is essential to Malawi achieving its development goals. Girls are an important target to achieve these Country Development Cooperation Strategy objectives.

Since Malawi introduced free primary education in 1994, the numbers of boys and girls enrolling in the first four years of primary school has grown exponentially; however, girls tend to fare worse than boys in examinations. Despite progress made to date, only a small percentage of girls and boys are able to go to secondary school due to a lack of schools and trained teachers, and once there, more girls drop out than boys.

The Let Girls Learn project will be implemented in five districts in Malawi with activities focused on increasing girls’ participation and retention in schools, as well as providing resources for some vulnerable boys. The five districts are: Balaka, Machinga, Phalombe, Chikwawa, and Mzimba.

Key project activities consist of:
A. Provide school bursaries.
B. Support mentoring to teachers and coaches.
C. Develop a School Buddies program for girls who have dropped out of school in the last year.
D. Train female teachers and deliver role model professional development.
E. Train on child led-reporting design and referral flow charts.
F. Host science and math camps.
G. Deliver life skills programs to boys and girls, including financial and entrepreneurship training.
H. Expand the Adolescent’s Sexual Reproductive Health (ASRH)/Adolescent Reproductive health (ARH) service hotlines.
I. Deliver training and mentoring for fathers (Real Fathers Program).
J. Draft an Environmental Impact Evaluation to inform construction activities.
K. Construction of a dormitory.
L. Construction of secondary schools.
Threshold Determinations
Based on an analysis for potential environmental impacts, the following determinations are recommended for each activity:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Recommended Threshold Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Provide school bursaries</td>
<td>22 CFR 216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);</td>
</tr>
<tr>
<td>B. Support mentoring to teachers and coaches</td>
<td>22 CFR 216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);</td>
</tr>
<tr>
<td>C. Develop a School Buddies program for girls who have dropped out of school in the last year</td>
<td>22 CFR 216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);</td>
</tr>
<tr>
<td>D. Train female teachers and deliver role model professional development</td>
<td>22 CFR 216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings;</td>
</tr>
<tr>
<td>E. Train on child led reporting design and referral flow charts</td>
<td>22 CFR 216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings;</td>
</tr>
<tr>
<td>F. Host science and math camps</td>
<td>22 CFR 216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings;</td>
</tr>
<tr>
<td>G. Deliver life skills programs to boys and girls including financial and entrepreneurship training</td>
<td>22 CFR 216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);</td>
</tr>
<tr>
<td>H. Expand the ASRH/ARH service hotlines</td>
<td>22 CFR 216.2(c)(2)(v) Document and information transfers; vii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.);</td>
</tr>
<tr>
<td>I. Deliver training and mentoring for fathers (Real Fathers Program)</td>
<td>22 CFR 216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);</td>
</tr>
<tr>
<td>J. Draft an Environmental Impact Evaluation to inform construction activities</td>
<td>22 CFR 216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings;</td>
</tr>
<tr>
<td>K. Construction of a dormitory</td>
<td>Deferral</td>
</tr>
<tr>
<td>L. Construct secondary schools</td>
<td>Deferral</td>
</tr>
</tbody>
</table>

For all construction activities, with the exception of studies and planning, the threshold determination is deferred until enough information for meaningful analysis is available.

**Recommended Actions**
The conditions required of this action are:

1. **Categorical Exclusions.** All proposed activities with the exception of construction activities are Categorically Excluded, as they represent education, technical assistance, or training programs; analyses, studies, academic or research workshops; and documentation and information transfers. These activities do not normally have an adverse direct, indirect, or cumulative impact on the environment.

2. **Mission Activity Manager Role.** Should the activity, as observed by the Mission Activity Manager or the Agreement Officer's Representative (AOR) (or their designee) identify potential adverse impacts not previously identified, the Activity Manager will notify the AOR and the AOR will cease operations until the appropriate environmental analysis can be completed.

USAID/Malawi Let Girls Learn Project IEE—Facesheet • December 2016 • pg. 3
3. **Climate Change.** Activities that are not Categorically Excluded are required to undergo climate risk screening per USAID guidance [https://www.usaid.gov/sites/default/files/documents/1868/201mal.pdf](https://www.usaid.gov/sites/default/files/documents/1868/201mal.pdf). The implementer must include as part of the Environmental Impact Evaluation an analysis of climate risk for dormitory and school construction, as well as consider the contribution of such activities to climate change. The Environmental Impact Evaluation must identify mitigation measures or adaptation strategies based on the climate analysis, and build those measures into design, implementation, and oversight of those activities. The implementer must also complete the Climate Risk Screening Matrix (Annex A). The completed Climate Risk Screening Matrix will be shared with the GCC/Climate Risk Management Facilitator, and further shared with the E3 Bureau Environmental Office (BEO) through the AOR.

4. **Deferral.** All construction activities with the exception of studies and planning are deferred until sufficient information required for meaningful environmental analysis is made available. The environmental review of construction activities must occur at the earliest practicable point in the work plan process. An appropriate environmental analysis of dormitory and school construction must be performed by the action proponent before USAID can fulfill the entirety of its mandatory environmental review under 22 CFR 216. An amendment to this IEE with a Threshold Determination satisfying the requirements of the deferral and 22 CFR 216 must be in place prior to the obligation of funding for physical construction activities, along with an appropriate modification to the award regarding any updated environmental compliance requirements. For those activities encompassed by the IEE amendment that have the potential for adverse environmental or social impacts (i.e., construction), the implementing partner will submit an Environmental Mitigation and Monitoring Report to the AOR and BEO for review and concurrence.

5. **Revisions.** Any new activities, incremental funding, or change in geographic location or scope of any project or activity will require additional analysis and documentation consistent with 22 CFR 216. No activity falling under this requirement will be implemented unless an Environmental Threshold Decision, as defined in 22 CFR 216.3(a)(2), has been reached for that activity and documented in a Request for Categorical Exclusion (RCE), IEE, or Environmental Assessment (EA) signed by the E3 BEO and a signed copy delivered to the AOR.

6. **Compliance with Host Country Requirements:** Nothing in this IEE substitutes for or supersedes the Recipient's responsibility for compliance with all applicable and appropriate host country laws and regulations. Implementation will in all cases adhere to appropriate and applicable host country environmental laws and policies.

7. **Environmental and Social Sustainability:** All acquisition and assistance efforts will advocate for best practices regarding sustainable use, including principles of environmental protection, impact mitigation and environment sustainability.

8. **Agreement Officer (AO) Responsibilities:** USAID procurement should include consideration of the implementing partner's ability to perform the mandatory environmental compliance requirements as envisioned under the Project. The AO shall include required environmental compliance and reporting language into each implementation instrument, and ensure that appropriate resources (budget), qualified staff, equipment, and reporting procedures are dedicated to the project.

9. **Agreement Officer's Representative Responsibilities:** The AOR, through the Agreement Officer will:

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Consult with the BEO to conduct an analysis of the potential environmental and social impacts of the illustrative project types and prepare an amendment to this IEE document with a definitive threshold determination for construction activities for which a Deferral is currently in place.

Ensure that the construction work plan or procurement of vendors (with the exception of procurement of a vendor to draft the Environmental Impact Evaluation) is not approved for implementation, that no funds are obligated, and that no earth moving, clearing, or other site preparation or construction is begun until the Deferral is resolved.

As appropriate, reserve the right to and may undertake field visits and consultations to assess compliance with the terms and conditions of this IEE.

The AOR, in consultation with the Mission Activity Manager and implementing partners, Mission Environmental Officer (MEO), Regional Environmental Officer (REO), and/or BEO as appropriate, will actively monitor and evaluate whether environmental consequences unforeseen under activities covered by this IEE arise during implementation, and modify or end activities as appropriate. If additional activities not described in this document are added to the primary award, an amended IEE must be prepared.

On an annual basis, document the activities that are under consideration as pilot actions, and will identify the status of the environmental and social analysis documentation, as well as the sufficiency of that documentation.

The AOR will ensure that no activities are approved for implementation without environmental analysis and a threshold decision. Should there be a positive threshold decision, the AOR will ensure that an environmental analysis is completed and the proposed activity does not begin prior to the conclusion of the procedures set forth in 22 CFR 216.3.

10. Limitations of IEE: This IEE does not cover the use or procurement of pesticides as described in 22 CFR 216 and those activities in 216.2(d), 216.5 and/or FAA 117, 118 or 119.
US Agency for International Development (USAID) / Malawi
Initial Environmental Examination (IEE)
Let Girls Learn Malawi

APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

CLEARANCE: 
Office Director: __________________________ Date: ___________________ 

CONCURRENCE: 
Bureau Environmental Officer: __________________________ Date: ___________________ 

Filename: __________________________

ADDITIONAL CLEARANCES:
(Add as appropriate; type name under signature line)

Mission Environmental Officer: __________________________ Date: ___________________ 
Madalitso Kaferawanhu

Activity Manager: __________________________ Date: ___________________ 
(A/COR) Type name under signature line

Team Leader: __________________________ Date: ___________________ 
Type name under signature line

Regional Environmental Advisor: __________________________ Date: ___________________ 
Kerry Reeves (acting)

Bureau Environmental Advisor: __________________________ Date: ___________________ 

OPTIONAL CLEARANCES:

General Counsel: __________________________ Date: ___________________ 

Regional Legal Advisor: __________________________ Date: ___________________ 

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/ACTIVITY DATA:
Program/Activity Title: USAID/ Malawi Let Girls Learn
Country/Region: Malawi

USG Foreign Assistance Framework:
Functional Objective: Investing in People
Program Areas: 3.2—Education
Program Elements: 3.2.1—Basic Education
Period covered: FY 2017 – FY 2022
Life of Project Amount: $10.5 Million

1.0 BACKGROUND AND PROJECT/ACTIVITY DESCRIPTION

1.1 Purpose and Scope of IEE

This Initial Environmental Examination (IEE) addresses all activities under the USAID/Malawi Let Girls Learn project. This education partnership is implemented by Save the Children Federation, Inc. (SC) and its partners, Forum of African Women Educationalists (FAWEMA) and Grassroot Soccer (GRS) to deliver a range of district-tailored activities to mitigate the barriers to girls' enrolment and retention in school set around challenges at home, in school, in the community, with the girl herself, and inherent in the system.

The purpose of this document, in accordance with Title 22, Code of Federal Regulations, Part 216 (22 CFR 216), is to provide a preliminary review of the reasonably foreseeable effects on the environment of education, health, and construction activities under the Let Girls Learn project, and on this basis, to recommend determinations and, as appropriate, attendant conditions, for these activities. This IEE is an essential element of a mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation for USAID-supported activities. Upon final approval of this IEE, these recommended determinations are affirmed as 22 CFR 216 Threshold Decisions and Categorical Exclusions, and conditions become mandatory elements of project implementation.

Let Girls Learn will leverage ongoing projects but deliver a package of district-specific interventions in five districts also serviced by other USAID/Malawi education projects. Therefore, activities implemented under the Let Girls Learn project are not currently covered by the existing FY13-FY19 Malawi Education Office Early Grade Reading Project IEE; they are instead addressed in this stand-alone IEE

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1 USAID/Malawi Education Office Early Grade Reading Project.
1.2 Background (Context and Justification)

USAID’s primary focus in the Malawi Country Development Cooperation Strategy (CDCS) is on promoting Malawi’s self-reliance and economic development, which will lead to increases in the quality of essential services. The delivery of quality education services and the resulting increase in learning levels will strengthen the impact of investments in education and lead to improved human resource capacity to deliver other services such as health, agriculture and food security, decreased dependence on humanitarian assistance, and increased ability of the people to make a positive contribution in the economy. Education is the foundation to social, economic and political development; a productive, educated human resource base is essential to Malawi achieving its development goals. Girls are an important target in achieving CDCS objectives.

Since Malawi introduced free primary education in 1994, the numbers of boys and girls enrolling in the first four years of primary school has grown exponentially; however girls tend to fare worse than boys in examinations. Despite progress made to date, only a small percentage of girls and boys are able to go to secondary school due to a lack of schools and trained teachers, and once there, more girls drop out than boys. As such, many girls are leaving the education system without having attained basic literacy, numeracy or essential life skills, making them more dependent on marriage and a husband’s support. Societal norms that lead to gender inequalities make girls responsible for the majority of household chores, resulting in them arriving late to school or reducing time for homework, causing them to fall behind. This gender bias and societal perception of what a girl’s role can and should be and what she is capable of also influences whether a guardian will allocate scarce resources to support a girls’ education. Sexual violence and abuse, the lack of sexual and reproductive health knowledge and youth-friendly services, and girls’ inability to negotiate safe sex due to restrictive gender norms can mean many girls are forced to drop out of school due to pregnancy. Education quality also acts as a barrier to enrolment and retention. Nearly half of the current cadre of secondary school teachers do not hold a professional education qualification – either a certificate, diploma or degree.

The Let Girls Learn Results Framework is:

**Objective:** Increased enrollment and retention in education programs for girls

- **IR 1** Increased school access and performance
  - **IR 1.1** Increased secondary school enrollment
  - **IR 1.2** Improved secondary instruction

- **IR 2** Increased girls’ agency and self-efficacy
  - **IR 2.1** Increased access to activity-based life skills education
  - **IR 2.2** Improved financial literacy
  - **IR 2.3** Increased mentoring and support in secondary schools
  - **IR 2.4** Increased access to adolescent sexual reproductive health information

- **IR 3** Improved attitudes and support for girls’ education and safety
  - **IR 3.1** Enhanced fathers’ engagement in girls’ education
  - **IR 3.2** Improved school-related gender-based violence reporting systems

1.3 Summary of Activities

The Project will implement similar activities in five districts. However the menu of activities will vary depending on the district, target population, and expected beneficiaries. The districts are Balaka, Machinga, Phalombe, Chikwawa, and Mzimba. Table 1 summarizes activities planned for each district.
<table>
<thead>
<tr>
<th>Activity</th>
<th>Balaka</th>
<th>Machinga</th>
<th>Phalombe</th>
<th>Chikwawa</th>
<th>Mzimba</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Provide school bursaries</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>B. Support mentoring to teachers and coaches</td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>C. Develop a School Buddies program for girls who have dropped out of school in the last year</td>
<td></td>
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<td>X</td>
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<td>D. Train female teachers and deliver role model professional development</td>
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<td>X</td>
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<td>E. Train on child led reporting design and referral flow charts</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
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<tr>
<td>F. Host science and math camps</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
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<td>G. Deliver life skills programs to boys and girls including financial, and entrepreneurship training</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
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</tr>
<tr>
<td>H. Expand the Adolescent's Sexual Reproductive Health (ASRH)/Adolescent Reproductive health (ARH) service hotlines</td>
<td></td>
<td></td>
<td>X</td>
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<td>I. Deliver training and mentoring for fathers (Real Fathers Program)</td>
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<td>X</td>
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<td>J. Draft an Environmental Impact Evaluation to inform construction activities</td>
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<td></td>
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<td>K. Construction of a dormitory</td>
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<td>L. Construct secondary schools</td>
<td>X</td>
<td></td>
<td>X</td>
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</tr>
</tbody>
</table>

Below is a summary of activities proposed for implementation by the Let Girls Learn project.

**A. Provide school bursaries.** The Let Girls Learn project will support bursaries across all five districts over the Let Girls Learn period of performance including both girls and (in some districts) vulnerable boys. Bursaries may be used for tuition, books, or other school fees. Bursary awardees will be determined through a competition based on an English essay, attendance and grades, and family and financial need.

**B. Support mentoring to teachers and coaches.** Mentor coaches and teachers from the selected secondary school will provide additional guidance and monitoring of girls in the dormitories and schools. Additionally, working closely with Peace Corps, and Girl’s Empowerment through the Education and Health Activity (ASPIRE) project, Let Girls Learn will roll out a mentoring program to improve the capacity of science, math, and English teachers in secondary schools. Mentor teachers will be selected from higher quality secondary schools in the district, as well as the teacher training college and teacher development centers.

**C. Develop a School Buddies program for girls who have dropped out of school in the last year.** The School Buddies program will focus on providing a buddy for those girls who have returned to school after spending at least a year out of school, either due to pregnancy or marriage or another reason. Girls who have dropped out will be paired with a buddy so they can continue to learn before returning to school and catch-up upon returning.
D. Train female teachers and deliver role model professional development. All female teachers will receive a three-day training in role modelling, support and guidance for girls, the teachers’ code of conduct, and how to set up a network for female teachers. Each term, the teachers will be encouraged to meet at the zone and district level to discuss ways to better support learners at their school, but also issues that affect them as teachers.

E. Train on child-led reporting design and referral flow charts. Let Girls Learn will build upon links between schools and relevant community support structures to increase the number of school-related gender-based violence abuses that get reported, as well as to ensure referrals for needed support services are made. Using one of the existing female teacher network meetings, female teachers will be introduced to a child-friendly teacher’s code of conduct and designing a reporting and referral pathway for their school.

F. Host science and math camps. The program will bring 50 girls (from primary and secondary schools) to a weekend camp at the zonal level. The girls will stay overnight at a school or other government building and will be chaperoned by female teachers and partner staff. The weekend activity will include a discussion by one of the mentor teachers on science and math, but will also include female role models from the industry who will provide career guidance.

G. Deliver life skills programs to boys and girls including financial and entrepreneurship training. Let Girls Learn will design and develop a sport-based program and curriculum to improve sexual and reproductive health education, transform gender norms, and build important life skills such as self-efficacy, confidence, and basic self-defence. The project will also integrate financial literacy and entrepreneurship education into the program. The messages will be delivered through an innovative soccer-based methodology.

H. Expand the Adolescent's Sexual Reproductive Health (ASRH)/Adolescent Reproductive Health (ARH) service hotlines. ASRH and ARH hotlines allow people, particularly those from rural communities, to call or SMS toll-free lines to seek maternal and child health information, advice and care, as well as information on a range of other health issues. The toll-free line is operated by a qualified health worker who provides support to callers or those who send text messages. Let Girls Learn will contribute to the extension of the service in districts in which it is already operating. The financial contribution would include the cost of training additional health workers to answer the hotline, and for Village Reach to carry out community mobilisation in the districts where the service will be available.

I. Deliver training and mentoring for fathers (Real Fathers Program). Real Fathers will target fathers of adolescent girls who are either in school or out of school. The program teaches parenting and relationship skills that can help improve families’ health, while male mentors tackle negative values and behaviors in the community.

J. Draft an Environmental Impact Evaluation to inform construction activities. In order to inform dormitory and school construction and to meet requirements for pre-construction environmental analysis, Let Girls Learn will consult with Ministry of Education, Science, and Technology (MoEST), USAID, and construction experts to prepare an Environmental Impact Evaluation for selected sites. The location of the planned schools in Balaka and Machinga, and the dormitory in Mzimba, will be determined based on discussions with MoEST, along with USAID, to ensure proper site selection criteria are applied.
K. Construction of a dormitory. A 50-bed female dormitory will be constructed for a selected government secondary school in Mzimba by a construction company engaged through normal procurement processes. The competitive procurement process for the dormitory construction will begin upon completion and acceptance of the Environmental Impact Evaluation with a planned completion date of USG FY17 Q4, in time for the start of Malawi’s 2017-2018 Academic Year.

L. Construction of secondary schools. Five new secondary schools will be built in Machinga District (200 students each). Three of these schools will be constructed in year 1, for occupancy in the academic year beginning in FY17 Q4. The remaining two schools will be built in year 2 to be ready for occupancy, at the latest, in the academic year beginning in FY18 Q4. Five new secondary schools will be built in Balaka District (200 students each). These schools will be constructed during year 2 of the project to be ready for occupancy, at the latest, in the academic year beginning in FY18 Q4.

Clear site selection criteria (such as the pass rate/quality of the primary school to which the secondary school will be attached, as well as functioning utilities, e.g., borehole and segregated latrines) will be developed with USAID and the MoEST in year 1.

2.0 BASELINE INFORMATION AND APPLICABLE HOST COUNTRY REQUIREMENTS

2.1 Locations Affected & Baseline Information

Locations Affected\(^2\). Malawi is a land-locked country in south central Africa with a land area of approximately 118,484 square kilometers. According to the 2008 Housing and Population Census, the population of Malawi was estimated to be approximately 13.1 million, 85 percent of which lived in rural areas. Malawi’s capital is Lilongwe, and its commercial center is Blantyre, with a population of more than 500,000. Malawi has two sites on the UNESCO World Heritage List: Lake Malawi National Park was first listed in 1984; and the Chongoni Rock Art Area was listed in 2006.

Malawi’s climate is hot in the low-lying areas in the south of the country and temperate in the northern highlands. Due to the country’s altitude, temperatures remain moderate rather than being an otherwise equatorial climate. Between November and April the temperature is warm with equatorial rains and thunderstorms, with the storms reaching their peak severity in late March.

Malawi is among the world’s least-developed countries and has low health and education standards. The USAID project will target schools in five districts in Malawi: Machinga, Balaka, Chikwawa, Phalombe, and Mzimba. Activities will primarily take place in schools with some activities implemented as extra-curricular interventions, such as the Real Fathers program and Adolescent Sexual Reproductive Health hotlines, which target out-of-school children and community members.

Malawi Education Sector Profile\(^3\). Faced with the challenges of inadequate school facilities, high dropout rates and pupil-teacher ratios, and low completion rates and learning achievement for children in poor rural areas with high prevalence of HIV/AIDS, the MoEST developed the 10-year National Education Sector Plan (NESP) for Malawi in 2008 to 2017/2018. The NESP outlines the country’s strategy

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USAID/Malawi Let Girls Learn Project IEE • December 2016 • pg. 5
to achieve equitable access to education and improve the quality of learning, system governance, and management by expanding early childhood education, improving the quality and relevance of basic education, promoting technical and vocational training, and supporting higher education and research.

The MoEST developed two Education Sector Implementation Plans (ESIP) to serve as a roadmap to achieving objectives. ESIP2 (2014-2018) focuses on improving quality in primary education and increased access to secondary education in Malawi while acknowledging the unacceptably low level of academic performance and learning. The government now commits more than 18 percent of its national budget to education.

Girls are lagging behind boys in attendance and achievement. From Standard 5, the number of girls dropping out far surpasses that of boys. By the time girls reach Standard 8, they have far lower attendance than boys (35 percent of boys and 27 percent of girls reached Standard 8 in 2013). Girls also tend to fare worse than boys in examinations. In 2014, 73 percent of boys who sat for the Primary School Leaving Certificate Examination passed, compared with a rate of 61 percent for girls.

Early marriage and pregnancy also strongly influence education levels. Nearly 29 percent of girls under 19 have started childbearing, which heavily impacts the ability to keep up with and finish school as the girl often drops out for at least a year and cannot keep pace with other students upon returning. Additionally, 46 percent of girls marry before they reach the age of 19. Early marriage also affects school attendance and performance rates.

Violence in schools against girls is also a serious concern. The Government of Malawi and UNICEF conducts a Violence against Children Survey. In 2013, 22.8 percent of girls ages 13 to 17 had experienced sexual violence in the previous year. These victims also rarely seek assistance with only 14 percent of those assaulted seeking help after the attack.5

2.2 Applicable Host Country Requirements

Environmental Assessment. Chapter III (13) (d) of the Malawian Constitution states, “The State shall actively promote the welfare and development of the people of Malawi by progressively adopting and implementing policies and legislation aimed at achieving the following goals:

To manage the environment responsibly in order to 1) prevent the degradation of the environment; provide a healthy living and working environment for the people of Malawi; 2) accord full recognition to the rights of future generations by means of environmental protection and the sustainable development of natural resources; and 3) conserve and enhance the biological diversity of Malawi.”

Part II section 3 (2) of the Environment Management Act (EMA) of 1996 provides for the protection and management of the environment and the conservation and sustainable utilization of natural resources in Malawi; section 5 (1) gives every Malawian a right to a clean and healthy environment. Part V section 24 states the need for Environmental Impact Assessment (EIA) Audit and Monitoring. Under this section,

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the Minister is mandated to specify the types and sizes of projects which shall not be implemented unless an EIA is carried out.

Sections 24 – 26 of the EMA delegate management of the EIA process to the Director of Environmental Affairs and outline all steps that must be followed before implementing any project. EIA guidelines to implement sections 24 - 26 of the EMA were put in place in December 1997. The guidelines provide a list of programs for which an EIA is mandatory, and specify the steps that must be followed when preparing an EIA. The EMA also specifies that any project subject to EIA requirements cannot be licensed and implemented until a satisfactory EIA study has been completed and the project has been approved by the Director of Environmental Affairs. EIA is therefore a statutory requirement in Malawi and the EMA provides for penalties for non-compliance. The Environmental Affairs Department has overall responsibility for ensuring that EIAs are carried out for all projects in accordance with national standards.

2.3 Climate Change

According to the USAID Malawi Climate Change factsheet, Malawi has suffered from dry spells and intense rainfall over the past two decades. Due to high population growth, rapid deforestation and widespread soil erosion, Malawi’s agriculturally based economy is particularly susceptible to the negative consequences of climate change. With projected increases in temperatures, more erratic precipitation patterns, and increasing frequency and intensity of extreme weather events, already-distressed economic and social systems in Malawi are likely to become more strained.

Let Girls Learn targets educational opportunities with activities that are focused on keeping girls in school and primarily eligible for Categorical Exclusion. However, climate change can be a barrier to achieving the project objective of, “Increased enrollment and retention in education programs for girls.” An increased frequency of both drought and flooding will reduce the production of staple crops, directly impacting food security, health, and nutrition. Maize, a staple crop for Malawi, is particularly vulnerable to drought and changes in seasonality of the rains. Girls may be removed from school because they cannot pay school fees due to the loss of household income during times of drought or food insecurity. Droughts can also lead to localized depletion of groundwater, making local boreholes insufficient to reach dropping water tables, which recede during droughts. Girls are typically responsible for water fetching, which can become more time consuming if water availability and access is reduced. This can affect their school attendance and performance.

Let Girls Learn also entails dormitory and school construction. Depending on siting, this infrastructure could be at risk from climate change due to erratic rainfall patterns and dangers of flooding or landslides. The specific potential risks to such construction cannot be evaluated until sites are selected.

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Summary of Climate Impacts and Vulnerability in Malawi

Historic Weather and Climate

- Observations indicate that average annual temperatures have risen 0.9°C since 1960, an average rate of 0.21°C per decade.
- Changes in patterns of El Niño, associated with low rainfall and droughts, and La Niña, associated with intense rainfall and floods, have increased climate variability and reduced predictability.
- Long-term precipitation trends have been difficult to establish for Malawi given the high degree of intra- and inter-year variability in rainfall.
- There has been a noted increase in the frequency of flooding and drought events.

Projected Weather and Climate

While projections for Malawi vary across models depending on assumptions, the majority of climate models suggest:

- An increase in average annual temperatures from the 1970-99 average of 1.1-3.0°C by the 2060s, and of 1.5-5.0°C by the 2090s.
- Projected changes in annual precipitation for the 2030s range from a decrease of 13 percent to an increase of 32 percent from the 1970-99 average.
- Even with an estimated increase in total annual rainfall, the number of rainfall events is likely to decrease, with significant increases in the intensity of each episode.
- There will be an increase in the frequency of droughts and floods.

3.0 Potential Environmental Impacts

Pursuant to 22 CFR 216.2(c)(2), the following activities do not have direct, indirect, or cumulative environmental impacts and would normally qualify for Categorical Exclusion. These activities are listed in Table 2.

Table 2. Activity environmental impacts and recommended threshold determination

<table>
<thead>
<tr>
<th>Activity</th>
<th>Categorical Exclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Provide school bursaries (Girls and/or boys)</td>
<td>(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.);</td>
</tr>
<tr>
<td>B. Support mentoring to teachers and coaches</td>
<td>(iii) Analyses, studies, academic or research workshops and meetings;</td>
</tr>
<tr>
<td>C. Develop a School Buddies program for girls who have dropped out of school in the last year</td>
<td>(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.);</td>
</tr>
<tr>
<td>D. Train female teachers and deliver role model professional development</td>
<td></td>
</tr>
<tr>
<td>E. Train on child led reporting design and referral flow charts</td>
<td></td>
</tr>
<tr>
<td>F. Host science and math camps</td>
<td></td>
</tr>
<tr>
<td>G. Deliver life skills programs to boys and girls including financial and entrepreneurship training</td>
<td>(v) Document and information transfers; viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.)</td>
</tr>
<tr>
<td>H. Expand the ASRH/ARH service hotlines</td>
<td></td>
</tr>
<tr>
<td>I. Deliver training and mentoring for fathers (Real)</td>
<td>(i) Education, technical assistance, or training programs except</td>
</tr>
</tbody>
</table>

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Activities K and L (Dormitory and School Construction). Pursuant to 22 CFR 216, certain activities (i.e., construction of dormitories and schools) require additional analysis within this IEE as they may have a foreseeable and direct impact on the environment. However, the setting, nature, and magnitude of any such impacts cannot be determined until detailed information regarding the siting and design of construction activities is made available for review. The recommended threshold determination therefore cannot be made until additional analysis is completed. This analysis should be completed at the earliest point possible in the work planning process, pending availability of sufficiently detailed information on the proposed construction activities.

Additionally, construction activities must be screened for climate risk according to USAID’s Climate Risk Management for USAID Projects and Activities: A Mandatory Reference for ADS Chapter 201 (see https://www.usaid.gov/sites/default/files/documents/1868/201mal.pdf). Table 3 provides a summary of climate analysis deferrals.

Table 3. Review of climate risk screening for Let Girls Learn

<table>
<thead>
<tr>
<th>Activity</th>
<th>Impacts/Risks</th>
<th>Climate Impact</th>
<th>Significance (high, moderate, low)</th>
<th>Condition/Adaptation/Action</th>
<th>Recommended Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>J. Draft an Environmental Impact Evaluation to inform construction activities</td>
<td>None</td>
<td>None</td>
<td>None</td>
<td>EIA to include analysis of potential impacts of climate on infrastructure and water availability, if applicable, including completion of the CRM tool in Annex A</td>
<td>Categorical Exclusion</td>
</tr>
<tr>
<td>K. Construction of a dormitory</td>
<td>TBD</td>
<td>TBD</td>
<td>TBD</td>
<td>TBD</td>
<td>Deferral</td>
</tr>
<tr>
<td>L. Construction of secondary schools</td>
<td>TBD</td>
<td>TBD</td>
<td>TBD</td>
<td>TBD</td>
<td>Deferral</td>
</tr>
</tbody>
</table>
4. GENERAL PROJECT IMPLEMENTATION AND MONITORING REQUIREMENTS

The conditions required of this action are:

1. **Categorical Exclusions.** All proposed activities with the exception of construction activities are Categorically Excluded, as they represent education, technical assistance, or training programs; analyses, studies, academic or research workshops; and documentation and information transfers. These activities do not normally have an adverse direct, indirect, or cumulative impact on the environment.

2. **Mission Activity Manager Role.** Should the activity, as observed by the Mission Activity Manager or the Agreement Officer’s Representative (AOR) (or their designee) identify potential adverse impacts not previously identified, the Activity Manager will notify the AOR and the AOR will cease operations until the appropriate environmental analysis can be completed.

3. **Climate Change.** Activities that are not Categorically Excluded are required to undergo climate risk screening per USAID guidance (https://www.usaid.gov/sites/default/files/documents/1868/201mal.pdf). The implementer must include as part of the Environmental Impact Evaluation an analysis of climate risk for dormitory and school construction, as well as consider the contribution of such activities to climate change. The Environmental Impact Evaluation must identify mitigation measures or adaptation strategies based on the climate analysis, and build those measures into design, implementation, and oversight of those activities. The implementer must also complete the Climate Risk Screening Matrix (Annex A). The completed Climate Risk Screening Matrix will be shared with the GCC/Climate Risk Management Facilitator, and further shared with the E3 Bureau Environmental Office (BEO) through the AOR.

4. **Deferral.** All construction activities with the exception of studies and planning are deferred until sufficient information required for meaningful environmental analysis is made available. The environmental review of construction activities must occur at the earliest practicable point in the work plan process. An appropriate environmental analysis of dormitory and school construction must be performed by the action proponent before USAID can fulfill the entirety of its mandatory environmental review under 22 CFR 216. An amendment to this IEE with a Threshold Determination satisfying the requirements of the deferral and 22 CFR 216 must be in place prior to the obligation of funding for physical construction activities, along with an appropriate modification to the award regarding any updated environmental compliance requirements. For those activities encompassed by the IEE amendment that have the potential for adverse environmental or social impacts (i.e., construction), the implementing partner will submit an Environmental Mitigation and Monitoring Report to the AOR and BEO for review and concurrence.

5. **Revisions.** Any new activities, incremental funding, or change in geographic location or scope of any project or activity will require additional analysis and documentation consistent with 22 CFR 216. No activity falling under this requirement will be implemented unless an Environmental Threshold Decision, as defined in 22 CFR 216.3(a)(2), has been reached for that activity and documented in a Request for Categorical Exclusion (RCE), IEE, or Environmental Assessment (EA) signed by the E3 BEO and a signed copy delivered to the AOR.
6. **Compliance with Host Country Requirements**: Nothing in this IEE substitutes for or supersedes the Recipient's responsibility for compliance with all applicable and appropriate host country laws and regulations. Implementation will in all cases adhere to appropriate and applicable host country environmental laws and policies.

7. **Environmental and Social Sustainability**: All acquisition and assistance efforts will advocate for best practices regarding sustainable use, including principles of environmental protection, impact mitigation and environment sustainability.

8. **Agreement Officer (AO) Responsibilities**: USAID procurement should include consideration of the implementing partner's ability to perform the mandatory environmental compliance requirements as envisioned under the Project. The AO shall include required environmental compliance and reporting language into each implementation instrument, and ensure that appropriate resources (budget), qualified staff, equipment, and reporting procedures are dedicated to the project.

9. **Agreement Officer's Representative Responsibilities**: The AOR, through the Agreement Officer will:
   - Consult with the BEO to conduct an analysis of the potential environmental and social impacts of the illustrative project types and prepare an amendment to this IEE document with a definitive threshold determination for construction activities for which a Deferral is currently in place.
   - Ensure that the construction work plan or procurement of vendors (with the exception of procurement of a vendor to draft the Environmental Impact Evaluation) is not approved for implementation, that no funds are obligated, and that no earth moving, clearing, or other site preparation or construction is begun until the Deferral is resolved.
   - As appropriate, reserve the right to and may undertake field visits and consultations to assess compliance with the terms and conditions of this IEE.
   - The AOR, in consultation with the Mission Activity Manager and implementing partners, Mission Environmental Officer (MEO), Regional Environmental Officer (REO), and/or BEO as appropriate, will actively monitor and evaluate whether environmental consequences unforeseen under activities covered by this IEE arise during implementation, and modify or end activities as appropriate. If additional activities not described in this document are added to the primary award, an amended IEE must be prepared.
   - On an annual basis, document the activities that are under consideration as pilot actions, and will identify the status of the environmental and social analysis documentation, as well as the sufficiency of that documentation.
   - The AOR will ensure that no activities are approved for implementation without environmental analysis and a threshold decision. Should there be a positive threshold decision, the AOR will ensure that an environmental analysis is completed and the proposed activity does not begin prior to the conclusion of the procedures set forth in 22 CFR 216.3.

10. **Limitations of IEE**: This IEE does not cover the use or procurement of pesticides as described in 22 CFR 216 and those activities in 216.2(d), 216.5 and/or FAA 117, 118 or 119.
Annex A. Climate Risk Screening Matrix for Activities

<table>
<thead>
<tr>
<th>1.1: Defined or Anticipated Project Elements</th>
<th>1.2: Time-frame</th>
<th>1.3: Geography</th>
<th>2: Climate Risks</th>
<th>3: Adaptive Capacity</th>
<th>4: Climate Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>[List defined or anticipated project elements]</td>
<td>[List time-frame]</td>
<td>[List geog. scopes]</td>
<td>[Enter description of climate risks]</td>
<td>[Describe information Capacity, Social and Institutional Capacity, Human Capacity, and Financial Capacity]</td>
<td>[Enter rating for each risk: High, Moderate, or Low]</td>
</tr>
<tr>
<td>Example: Improving livestock productivity</td>
<td>Example: 0-15 years</td>
<td>Example: Rural</td>
<td>Example: Heat stress due to increasing extreme temperatures. Mortality from increasingly frequent/severe drought.</td>
<td>Example: Farmers have low access to insurance and many do not have alternate sources of income.</td>
<td>Example: High</td>
</tr>
</tbody>
</table>