Office of Afghanistan & Pakistan Affairs (OAPA)
INITIAL ENVIRONMENTAL EXAMINATION
Amendment 2

PROGRAM/ACTIVITY DATA

Country Code: 306
Program Area: Nutrition
Assistance Objective: To improve the health of the Afghan population
Intermediate Results: To improve nutrition outcomes for women and children less than five years old, with special focus on the first 1,000 days
Country or Region: Afghanistan
Activity Name: Improving Nutrition Outcomes
Funding Period: October 2015 to December 2020
Life of Project Amount: $135.61 Million
IEE Prepared by: Massoud Mehrzad and Maurice Shines
Date: 11/26/2017

ENVIRONMENTAL ACTION RECOMMENDED:

Categorical Exclusion [X] Deferral [ ]
Positive Determination [ ] Negative Determination [ ]
Negative Determination With [X] Exemption [ ]

Medium [ ] Low [X] High [ ]

Climate Change
Vulnerability Risk None [ ] Low [X] Medium [ ] High [ ]

1.0 PURPOSE, BACKGROUND AND ACTIVITY DESCRIPTION

1.1. Purpose and Background

The purpose of this 2nd Amendment to the PAD-level IEE for Improving Nutrition Outcomes is to:

1. Provide a refined description of two activities that received a Deferral in IEE Amendment 1 ("Weekly Iron Folic Acid Supplementation" (WIFS) and "Enhancing Community Access & Utilization of Zinc and ORS for Management of Childhood Diarrhea in Afghanistan" (ORS/Zinc)).
2. Remove the Deferral for the above activities and replace it with a Negative Determination with Conditions.
3. Refer to the Washington-based IEE for the Global Alliance for Improved Nutrition (GAIN) that applies to the Afghanistan/CAR Food Fortification activity. This IEE was not provided in the original IEE nor IEE Amendment 1.
4. Refer to a separate project-specific IEE for IHSAN that was approved on 12/09/2016
5. Reflect on the imminent ending of the following activities: Weekly Iron Folic Acid Supplementation (WIFS) and the Global Alliance for Improved Nutrition (GAIN)’s activities in Afghanistan.

There are no other changes except what is stated above. All conditions, limitations and the stipulation for revisions established in the original IEE and Amendment 1 remain in force throughout the life of project (LOP). GAIN’s background, objectives and environmental compliance achievements is provided in Annex 1.

1.2. Activity Description

The Improving Nutrition Outcomes (INO) Original PAD-level IEE, (OAPA-15-OCT-AFG-0002, approved by the BEO on 10/28/2014) covered the following three components: 1) Comprehensive Nutrition, 2) Processing and Food Fortification; and 3) Micronutrient Supplementation. INO IEE Amendment 1 (OAPA-15-MAY-AFG-0020, approved by BEO on 5/21/2015) added a Deferral to cross-cutting activities under Micronutrient Supplementation (Component 2) and Food Fortification (Component 3) for the total amount of $55 million.

The following changes have occurred that warrant the issuance of PAD IEE Amendment 2. No further Amendments to the PAD-level IEE will be made as all activities now have their own activity-level specific IEEs or RCEs, or will be ending before the end of the calendar year 2017:

1) A stand-alone, activity specific IEE for the Initiative for Hygiene, Sanitation and Nutrition (IHSAN) under Component 1 (Comprehensive Nutrition), OAPA-17-DEC-AFG-0008, was approved by BEO on 12/9/2016: No other new activity is planned under this component.

2) Processing and Food Fortification: This component is a buy-in to a Washington-based Field Support mechanism Global Alliance for Improved Nutrition (GAIN) and is covered by a global Washington-based IEE, including an EMMP.

3) Micronutrient Supplementation: Two activities have been started under this component:

   a) Weekly Iron Folic Acid Supplementation (WIFS): This activity is aimed to reduce the iron deficiency anemia through supplementation of Iron Folic Acid to adolescent school girls. This is an assistance (program contribution) type of award which is implemented by UNICEF under a PIO grant. The activity will end by December 31, 2017. As USAID is relying to the UNICEF’s environmental procedures that UNICEF is obligated to follow, no specific USAID environmental requirements are applicable.

   b) Enhancing Community Access & Utilization of Zinc and ORS for Management of Childhood Diarrhea in Afghanistan (ORS/Zinc): This is also an assistance (program contribution) type of award which is implemented by UNICEF under a PIO grant. The activity duration is from 7/21/2015 to 7/20/2020. USAID is in the process of developing an activity-specific Request for Categorical Exclusion because USAID is relying on UNICEF’s environmental procedures that UNICEF is obligated to follow.

3.0 RECOMMENDED THRESHOLD DECISIONS AND MITIGATION ACTIONS

Below are the recommended actions for the activities described above, their impacts on the environment and recommended Threshold Determinations and Conditions, if any:
<table>
<thead>
<tr>
<th>Activity</th>
<th>Effects on natural or physical environment</th>
<th>Recommended Threshold Determination</th>
</tr>
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<tbody>
<tr>
<td>Comprehensive Nutrition Initiative for Hygiene, Sanitation and Nutrition (IHSAN)</td>
<td>Limited environmental and social impact if Conditions adhered to</td>
<td>Negative Determination with Conditions per 22 CFR 216.2(d)(1)(ii)</td>
</tr>
<tr>
<td>Processing and Food Fortification: Global Alliance for Improved Nutrition (GAIN)</td>
<td>Limited environmental and social impact if Conditions adhered to</td>
<td>Covered by the Washington-based IEE for GAIN, see <a href="http://gemini.info.usaid.gov/repository/pdf/49031.pdf">http://gemini.info.usaid.gov/repository/pdf/49031.pdf</a> IP must follow all applicable requirements under this IEE</td>
</tr>
<tr>
<td>Micronutrient Supplementation: Weekly Iron Folic Acid Supplementation (WIFS):</td>
<td>No effect on the natural or physical environment</td>
<td>Categorical Exclusions, <strong>no action required</strong> per 22 CFR 216.222 CFR 216.2 (c)(1)(ii) In accordance with ADS 351.3.23(c) and ADS 308.3.11(c), USAID will rely on UNICEF’s environmental and social policies and procedures (<a href="http://www.unicef.org/dad/unicefppmanualfeb07.pdf">http://www.unicef.org/dad/unicefppmanualfeb07.pdf</a>, [<a href="http://www.unicef.org/environment/files/Framework">http://www.unicef.org/environment/files/Framework</a> on Environmental Sustainability final as approved by OE D.3Dec15.pdf](<a href="http://www.unicef.org/environment/files/Framework">http://www.unicef.org/environment/files/Framework</a> on Environmental Sustainability final as approved by OE D.3Dec15.pdf)), its diligent planning and technical design, and implementation of the EA approved environmental mitigation and monitoring measures. No standalone RCE will be developed as the activity will end by December 31, 2017</td>
</tr>
<tr>
<td>Micronutrient Supplementation: Enhancing Community Access &amp; Utilization of Zinc and ORS for Management of Childhood Diarrhea in Afghanistan (ORS/Zinc):</td>
<td>No effect on the natural or physical environment</td>
<td>Categorical Exclusions, <strong>no action required</strong> per 22 CFR 216.222 CFR 216.2 (c)(1)(ii) In accordance with ADS 351.3.23(c) and ADS 308.3.11(c), USAID will rely on UNICEF’s environmental and social policies and procedures (<a href="http://www.unicef.org/dad/unicefppmanualfeb07.pdf">http://www.unicef.org/dad/unicefppmanualfeb07.pdf</a>, [<a href="http://www.unicef.org/environment/files/Framework">http://www.unicef.org/environment/files/Framework</a> on Environmental Sustainability final as approved by OE D.3Dec15.pdf](<a href="http://www.unicef.org/environment/files/Framework">http://www.unicef.org/environment/files/Framework</a> on Environmental Sustainability final as approved by OE D.3Dec15.pdf)), its diligent planning and technical design, and implementation of the EA approved environmental mitigation and monitoring measures. A standalone RCE is in process.</td>
</tr>
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</table>

Table 1. Activities, recommended threshold decisions and applicable IEEs and RCEs for the Improving Nutrition Outcomes program.

### 4.0 ENVIRONMENTAL RECOMMENDATIONS

**Recommended Action:** Categorical Exclusions (23 % of funding)
The Micronutrient Supplementation activities “Weekly Iron Folic Acid Supplementation (WIFS)” and “Enhancing Community Access & Utilization of Zinc and ORS for Management of Childhood Diarrhea in Afghanistan (ORS/Zinc)” are categorically excluded because they are implemented through UNICEF, a PIO, and USAID will rely on UN’s environmental procedures that UNICEF is obligated to follow:

22 CFR 216.22 CFR 216.2 (c)(1)(ii): *AID does not have knowledge of or control over, and the objective of AID in furnishing assistance does not require, either prior to approval of financing or prior to implementation of specific activities, knowledge of or control over, the details of the specific activities that have an effect on the physical and natural environment for which financing is provided by AID.*

**Recommended Action:** *Negative Determination with Conditions (77 % of funding)*

Activities under IHSAN and GAIN include Negative Determinations with Conditions and are covered by their own activity-specific IEEs

### 5.0 REVISIONS

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that activities to be funded by the project might be “major” and the project’s effect “significant,” or if additional activities are proposed that might be considered “major” and their effects significant, this IEE will be reviewed and revised by the originator of the project and submitted to the BEO/OAPA for approval and, if appropriate, an environmental assessment will be prepared. It is the responsibility of the USAID COR/AOR to keep the Mission Environmental Officer, USAID/Afghanistan and the BEO/OAPA informed of any new information or changes in scope and nature of the activity that might require revision of the IEE.

*Note that revisions, if warranted, will be done through the activity-specific IEEs or RCEs. This PAD-level IEE will no longer be further amended.*
APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS

Improving Nutrition Outcomes, IEE Amendment 2

Clearances: Date: 

Mohammad Ewaz Farhang 
Nov 28, 2017

Massoud Mehrzad 
Dec 3, 2017

Carol Wilson 

Christian La-Pietra-Fung 
12/3/17 

Harry Bottenberg 
11/28/2017

Kelly Mack 
12/8/2017

Tamra Halmrst-Sanchez 
12/3/2017

Jeffery Cohen 
12/4/2017

Andrei Barannik 
cleared by Email on 12/16/17

Herbert Smith 
12/4/2017

Concurrence: Date: 

Christopher Payne 
11/17/2016

DISTRIBUTION: MEO, COR/AOR, OAA, RLA
Annex 1. GAIN

Global Alliance for Improved Nutrition (GAIN) - Afghanistan/Central Asia Region Food Fortification activity

GAIN's Background and Objectives

Undernutrition affects most countries in Central and South Asia. In Afghanistan, there is a severe vitamin and mineral deficiency problem, including deficiencies in vitamin A, vitamin D, iron, folate and zinc. This project aims to increase availability and access to essential vitamins and minerals through fortified wheat flour, fortified edible oil and iodized salt by laying a strong foundation for a sustainable fortification program. The project does this by strengthening legislation, regulations and enforcement environment for fortified foods as well as initiating monitoring of these products at the consumption level. Specific objectives are to: 1) strengthen the regulatory framework, including support for the harmonization of standards for fortification with those of neighboring countries; 2) strengthen the quality control system; 3) strengthen public sector enforcement mechanisms; and 4) devise and test a practical and feasible system to monitor coverage, consumption and potential impact of fortified foods.

Summary of Main Achievements

During this reporting period, GAIN undertook the following activities to increase the availability of fortified foods in Afghanistan in a sustainable way:

- Continued to advocate for mandatory regulations of food fortification based on national fortification standards. The Ministry of Justice reviewed the regulation of fortified wheat flour and edible oils and sent it to the cabinet for approval in August 2017. Final approval was delayed when the Afghan Chamber of Commerce (ACCI) considered the fees to be too high, objected to regulations’ new license fee and proposed penalties for wheat flour and edible oil producers. GAIN supported consultation between the Ministry of Public Health (MOPH) and ACCI, which resolved the issues. The legislation has been returned to the cabinet for their final approval in November 2017. The minutes are attached as Annex V.

- In July, a delegation of Afghan experts attended the regional standards harmonization meeting in Almaty. This meeting marked the end of two years of regional consultations, a discussion of outcomes, and each country presenting its plans to adapt regional standards for wheat flour fortification.

- FACT survey analyses report was drafted and will be presented in December 2017.

- The four phases of the 101-day lab capacity building training for MOPH lab staff have been completed by ASSOCOM Institute of Bakery Management & Technology Institute of Bakery Technology & Management of India. After the PHLC machinery is operationalized, ASSOCOM will conduct a 15-days training for lab staff on using HPLC for the micronutrient tests in food commodities.

- Through support to Food and Agriculture Organization (FAO), GAIN facilitated an assessment of the nutrition regulatory framework. The report has been shared with
USAID for review and comments, along with relevant government ministries, private sector, and UN agencies.

- The project trained almost 130 food auditors and inspectors of the MOPH’s Environmental Health Department in Kabul, Mazar and Jalalabad regions on food quality and safety control measures. Additional trainings will be conducted in Kandahar and Herat regions this quarter.

- The project organized a meeting with the wheat flour producers and importers in Mazar Sharif to discuss the fortification status in the country and specifically the region as well as the importance and cost benefit of food fortification. The meeting also explored the establishment of a coordination mechanism between Afghan importers and Kazakh exporters. The ACCI was invited to the meeting and agreed to take additional responsibility to organize similar meetings going forward.

- Supported by the project, the Afghan Bakers’ Association scaled up its awareness-raising efforts among bakeries in Kabul, reaching almost 2/3rds of the 4,000 registered bakeries with training sessions, brochures and posters. The association also continued to collect information on bakery use of fortified flour.

- GAIN staff contributed to the revised version of the National Nutrition Strategy 2015-2020, which was led by Public Nutrition Division (PND) and presented by MOPH to nutrition stakeholders including USAID.

- A three-day mission to Mazar in September brought together 30 Afghan importers to inform them about upcoming fortification regulation and encourage them to commit to import only fortified wheat flour.

- The Afghanistan GAIN activities followed an Environmental Mitigation and Monitoring Plan (EMMP) developed and approved by the BEO of the Bureau of Global Health, USAID, Washington D.C., 5/27/2017

Since the scope of GAIN’s activities during the no-cost extension period do not differ from previous activities covered under its approved IEE, the IEE remains applicable until the new end date of the grant. The Assistance Officer’s Representative (AOR), based at USAID/W, was informed by the Bureau Environmental Officer that a new IEE was not necessary, only a memo to the file indicating that the IEE and EMMP remain relevant.