PROGRAM/ACTIVITY DATA

Country Code: 306
Program Area: Democracy & Governance
Assistance Objective: Performance and Legitimacy of the GfRoA Improved
Intermediate Results: IR. 3.2: Government at the National and Sub-national level strengthened.
Country or Region: Afghanistan
Activity Name: Conflict Mitigation Assistance for Civilians (COMAC)
Funding Period: March 12, 2018 to March 11, 2023
Life of Project Amount: $39.99 million
IEE Prepared by: Najibullah Niazi
Date: June/8/2018
IEE Amendment (Y/N): Y (Original IEE: OAPA-17-JULY-AFG-0037 concurred with by BEO on 7/5/2018)

ENVIRONMENTAL ACTION RECOMMENDED:

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

Climate Change
Vulnerability Risk Low [X] Medium [ ] High [ ]

1.0 PURPOSE, BACKGROUND AND ACTIVITY DESCRIPTION

1.1. Purpose and Background

The purpose of this Amendment to the IEE/RCE for [COMAC] is to:

1. Add certain program activities such as provision of seed and livestock, vaccination and provision (replacement) of damaged office equipment such as copier, printers, computers, desks, tables, chairs etc.; and limited touch-up painting of walls
2. Removal from the SOW of other office rehabilitation activities and new construction.
3. Provide a climate vulnerability screening matrix that was omitted with the original IEE.

Funding level, geographic scope and end date of COMAC remain the same.

1.2 Activity Description
Intermediate Result 1.0: Humanitarian Assistance: In coordination and collaboration with the Government of Afghanistan, provide appropriate assistance to victims of the conflict by effectively utilizing all available resources.

1. Delivery of food and household goods to families.
2. Medical services are provided, as needed, either locally through mobile medical units or district and regional medical institutions - or in the case of extreme cases, patients will be transported to Kabul where the best medical services in the country are available.
3. As part of Tailored Assistance; Baby Education and Hygiene support items will be provided, such as shampoo, soap, Vaseline, tooth paste, and dish washing liquid.
4. Small Business Management and Sustainability training and assistance.
5. Vocational trainings such as tailoring and embroidery; Mechanical repair; Carpentry; bakery; mobile repairing and etc.
6. Provision of seed and small ruminant livestock.
7. Diseased and unvaccinated livestock may have unintended health impacts
8. Provision (replaced of office damaged equipment) of equipment such as copiers, printers, computers, desks, tables, chairs etc. and limited touch-up painting of walls

Intermediate Result 2.0: Increase Government of Afghanistan’s capacity to respond to victims’ needs improved: Strengthen the capacity of Ministry of Labor, Social Affairs, Martyrs & Disabled (MoLSAMD) by conducting capacity building trainings, such as management, customer service training and etc.

Intermediate Result 3.0: Increase awareness of Victim Assistance services: Advocacy and outreach component is to improve citizens’ and Government of Afghanistan’s knowledge of victim assistance services through Radio, TV and printed press.

2.0 ENVIRONMENTAL RECOMMENDATIONS

Below are the recommended actions for the activities described above, their impacts on the environment and recommended Threshold Determinations and Conditions:

<table>
<thead>
<tr>
<th>Component</th>
<th>Activities</th>
<th>Effect on Natural or Physical Environment</th>
<th>Recommended Threshold Decision</th>
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</thead>
<tbody>
<tr>
<td>Intermediate Result 1: Humanitarian Assistants</td>
<td>1. Delivery of food and household goods to families. 2. Medical services are provided, as needed, either locally through mobile medical units or district and regional medical institutions - or in the case of extreme cases, patients will be transported to Kabul where the best medical services in the country are available.</td>
<td>Insignificant environmental and social impacts if Conditions are adhered to:</td>
<td>Negative Determination with Conditions:</td>
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<td>Conditions:</td>
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<td>1. Any food and medication not delivered and past expiration date will be disposed of in an environmentally safe manner and in accordance with local and national environmental law.</td>
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<td>2. Medical service providers that</td>
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</tbody>
</table>
3. As part of Tailored Assistance; Baby Education and Hygiene support items will be provided, such as shampoo, soap, Vaseline, tooth paste, and dishwashing liquid.

4. Small Business Management and Sustainability training and assistance.

5. Vocational trainings such as tailoring and embroidery; Mechanical repair; Carpentry; bakery; mobile phone repairing.

6. Provision of Seed and livestock.

7. Provision (replaced of office damaged equipment) of equipment such as copiers, printers, computers, desks, tables, chairs etc. and limited touch-up painting of walls.

NOTE: there will be no other refurbishment activities (apart from limited touch up painting) new construction.

patients will be referred to shall be screened to ensure they adhere to adequate standards for medical care and medical waste disposal in accordance with best practices and Afghan law, see for instance [http://www.usaidgems.org/Sectors/healthcareWaste.htm](http://www.usaidgems.org/Sectors/healthcareWaste.htm) and [http://www.usaidgems.org/Sectors/healthcareFacilities.htm](http://www.usaidgems.org/Sectors/healthcareFacilities.htm).

3. Purchase will be made from reputable and vetted companies and all items will be in their original packaging.

4. Vocational training shall include all safety and health standards applicable to the vocation, as available on [http://www.usaidgems.org/sectorGuidelines.htm](http://www.usaidgems.org/sectorGuidelines.htm).

5. No pesticides shall be provided.

6. No construction shall be provided; any small-scale rehabilitation, e.g. window replacement, wall repair, shall incorporate all applicable safety standards as available on [http://www.usaidgems.org/sectorGuidelines.htm](http://www.usaidgems.org/sectorGuidelines.htm).

7. Only seed varieties or livestock breeds approved by MAIL shall be procured. Procurement shall be made from reputable dealers, not from unlicensed vendors.

8. Seeds shall not have been treated with pesticides.

9. Seeds shall not be used for consumption.

10. In case of livestock, only healthy animals (goats, sheep, and poultry) shall be procured with all applicable certifications and vaccinations.

11. Only high quality materials
12. Waste (e.g. damaged equipment) shall be disposed of according to best practices and in accordance with local laws and regulations.

13. Paint, if any will be used, shall not contain lead; workers shall use appropriate safeguards while applying and clean up spills and dispose of empty cans in accordance with local laws and regulations.

14. An Environmental Mitigation and Management Plan (EMMP) has been developed by the IP concurrently with this IEE Amendment and has been reviewed and cleared by the MEO and AOR on June 26, 2018.

| Intermediate Result 2.0: Capacity Building | Illustrative activities: Strengthen the capacity of MoLSAMD by conducting capacity building trainings, such as; management, customer service training and etc. | No Impact | **Categorical Exclusion**, no action required per 22 CFR 216.2(c)(i), (iii) and (v) |
| Intermediate Result 3.0: Increased awareness of Victim Assistance services | Advocacy and outreach component to improve citizens’ and Government of Afghanistan’s knowledge of victim assistance services through Radio, TV and printed press. | No Impact | **Categorical Exclusion**, no action required per 22 CFR 216.2(c)(i), (iii) and (v) |

Table 1. Recommended Threshold Determinations and Conditions for COMAC

### 3.0 ENVIRONMENTAL RECOMMENDATIONS

#### 3.1 Recommended Action: Categorical Exclusions (ca. 30% of funding):
Activities under Intermediate Result 2 and 3 fall do not have an effect on the natural and physical environment fit within the categories listed in 22 CFR 216.2 (c)(2) and are categorically excluded from any
further environmental review requirements. The originator of the proposed action has
determined that the proposed activities are within the following classes of actions:
- Education, technical assistance, or training programs, except to the extent such
  programs include activities directly affecting the environment (such as construction of
  facilities, etc.). [22 CFR 216.2(c)(2)(i)];
- Analyses, studies, academic or research workshops and meetings. [22 CFR
  216.2(c)(2)(iii)];
- Document and information transfers. [22 CFR 216.2(c)(2)(v)]

3.2 Recommended Action: Negative Determination with Conditions (ca. 70 % of funding):
Activities that fall under Intermediate Result 1.0 will have negligible impact as long as the
following Conditions are adhered to:
1. Any food and medication not delivered and past expiration date will be disposed of in an
   environmentally safe manner and in accordance with local and national environmental law.
2. Purchase will be made from reputable and vetted companies and all items will be in their original
   packaging
3. Vocational training shall include all safety and health standards applicable to the vocation, as
4. No pesticides shall be provided.
5. No construction shall be provided; any small-scale rehabilitation, e.g. window replacement, wall
   repair, shall incorporate all applicable safety standards as available on
6. Only seed varieties or livestock breeds approved by MAIL shall be procured. Procurement shall
   be made from reputable dealers, not from unlicensed vendors.
7. Seeds shall not have been treated with pesticides.
8. Seeds shall not be used for consumption.
9. In case of livestock, only healthy animals shall be procured with all applicable certifications.
10. Only high quality materials should be purchased from reputable vendors. Any safe use guidance,
    if applicable, should be provided.
11. Waste (e.g. damaged equipment) shall be disposed of according to best practices and in
    accordance with local laws and regulations.
12. Paint, if any will be used, shall not contain lead; workers shall use appropriate safeguards while
    applying and clean up spills and dispose of empty cans in accordance with local laws and
    regulations.
13. An Environmental Mitigation and Management Plan (EMMP) has been developed by the IP
    concurrently with this IEE Amendment and has been reviewed and cleared by the MEO and AOR
    on June 26, 2018.

4.0 CLIMATE CHANGE RISK SCREENING

Afghanistan is extremely vulnerable to the impacts from global climate change. Temperatures
have been rising and are expected to rise even more and an increase in the frequency of extreme
weather events such as droughts and rainstorms may occur in the future, which may affect water
availability and affect crop and livestock production. To minimize the negative impacts of
climate change, USAID is required by ADS 200 and 201 to incorporate climate change risk
screening for all new projects as of October 1, 2016. A screening was conducted with the

current AOR for COMAC and facilitated by the MEO who is also an OAPA-based Climate Integration Lead (CIL) for the Mission. The findings are:

The impact of climate change on the successful implementation of COMAC’s activities is expected to be low as the goal of the program is measured by the successful distribution of support packages and services provision, not in terms of production output of enterprises managed by beneficiaries. There will be no construction of shelters. There could be some delay in distribution of supplies but many of these are already prepositioned so road closures as a result of floods and damage to bridges are expected to be a minor impediment. Also, climate is not expected to be adversely affected by COMAC activities and no further mitigation is deemed necessary. See Annex 1.

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.
APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS

Conflict Mitigation Assistance for Civilians (COMAC), IEE Amendment 1

AOR, Activity Manager

Office Director, ODG

Mission Environmental Officer and Climate Integration Lead

Office of Acquisition and Assistance (OAA)

Regional Environmental Advisor, SCA & OAPA

Resident Legal Officer

Acting Deputy Mission Director

Mission Director

Bureau Environmental Officer/OAPA

Clearances: 

Najibullah Niazi 

Scott W. Hedlund 

Harry Bottenberg 

Adam Walsh 

Andrei Barannik 

Kelly Mack 

Loren Stoddard 

Herbert Smith 

Christopher Payne

Date: 27 June 2018

Date: 6/28/2018

Date: 6/28/2018

Date: 6/28/2018

Date: 6/28/2018

Note to BEO:

☐ This IEE is Procurement Sensitive, do not post until cleared by Kabul/OAA
POC: Contracting Officer _____________, email _____________

☑ This IEE may be posted upon clearance.

DISTRIBUTION: MEO, COR/AOR, OAA, RLO
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<table>
<thead>
<tr>
<th>1.1: Tasks / Defined or Anticipated Tasks or Interventions</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>
<th>5: Opportunities</th>
<th>6.1: Climate Risk Management Options</th>
<th>6.2: How Climate Risks are Addressed in the Activity</th>
<th>7: Next Steps for Activity Implementation</th>
<th>8: Accepted Climate Risks</th>
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<tbody>
<tr>
<td>1: Delivery of food and household goods to families.</td>
<td>1. 60 days</td>
<td></td>
<td>Damage to shelters from floods caused by rapid snowmelt and excessive rainfall.</td>
<td>Afghan government, Ministry for Disaster Management and Humanitarian Affairs, and desks for climate change in Afghanistan and its relevance to the infrastructure sector.</td>
<td>Low (there will be no construction of shelters)</td>
<td>Better exchange of information and collaboration among ministries, NGOs and communities will improve response to disasters.</td>
<td>Use climate information to inform assessment and ensure designs are resilient to potential climate impacts.</td>
<td>Provide education and training to staff to be aware of and respond to weather-related emergencies.</td>
<td>Explore sources of information on climate and hydrology for the locations where shelters will be developed in Kandahar Province, including the Afghanistan Meteorological Department, NEPA, FEWS NET, SERVIR, MAI, and MEW.</td>
<td>Risks have been addressed</td>
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<tr>
<td>2: Medical services are provided, as needed, either locally through mobile medical units or district and regional medical institutions - or in the case of extreme cases, patients will be transported to Kabul where the best medical services in the country are available.</td>
<td>2. Medical services provided for up to 6 months. Benefit can last indefinitely.</td>
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<td>Delay in delivery of basic needs, including medical supplies, as a result of damage to roads and bridges due to floods caused by rapid snowmelt and excessive rainfall.</td>
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<td>Preposition supplies around various parts of urban centers of the country.</td>
<td>Develop contingency plans.</td>
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<td>3: As part of Tailored Assistance; Baby Education and Hygiene support items will be provided, such as shampoo, soap, Vaseline, tooth paste, and dish washing liquid.</td>
<td>3. Baby education and hygiene support items in first 60 days. Benefit can last indefinitely.</td>
<td>Nationwide</td>
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<td>4: Small Business Management and Sustainability</td>
<td>4. Training up to six months. Benefit can last indefinitely.</td>
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<td>5: Vocational trainings such as tailoring and embroidery; Mechanical repair; Carpenter; Bakery; Mobile repairing and etc.</td>
<td>5. Training can last up to 6 months. Benefit will last indefinitely.</td>
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<td>6: Provision of Seed and livestock assistance packages</td>
<td>6. Provision of seed and livestock within 3 months. Benefits vary depending on crop or livestock.</td>
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<td>7. Provision (replacement of office damaged equipment) of equipment such as copiers, printers, computers, desks, tables, chairs etc. and limited touch-up painting of walls</td>
<td>e.g., annual vs. perennial crops, livestock for dairy or eggs vs. slaughter</td>
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</table>

7. Provision of equipment within 3 months. Benefit can last from several years to indefinite
Re: For REA review: COMAC, IEE Amendment 1
1 message

Andrei Barannik <abarannik@usaid.gov>
To: Harry Bottenberg <hbottenberg@usaid.gov>
Cc: Mohammad Ismail Ibrahim <miibrahimi@usaid.gov>

Wed, Jun 27, 2018 at 4:17 PM

Harry - reviewed - looks OK - one Q: what will be done with medical waste?! or will it be only payment for services? pls add condition as warranted. With this I clear.
W/r & stay safe, Andrei P.S. pls also to do formatting

On Wed, Jun 27, 2018 at 2:24 AM, Harry Bottenberg <hbottenberg@usaid.gov> wrote:
Hi Andrei, pls see attached for your review, IEE Am. 1 for COMAC. The climate matrix is included as Annex 1.

harry

---------- Forwarded message ----------
From: Harry Bottenberg <hbottenberg@usaid.gov>
Date: Wed, Jun 27, 2018 at 10:52 AM
Subject: Re: COMAC IEE & Climate screening matrix
To: Najibullah Niazi <nniazi@usaid.gov>
Cc: Mohammad Ismail Ibrahim <miibrahimi@usaid.gov>, Fazil Menallah Aman <fmaman@usaid.gov>, Masood Ferhamand <mferhamand@usaid.gov>

Ok, thanks, Najib. I made some minor edits and improved the formatting, attached is the IEE Amendment with the climate matrix included. I will send this to REA Andrei Barannik and when he has cleared (possibly with edits) then we can start mission clearances.

So pls stay tuned.

harry

On Wed, Jun 27, 2018 at 9:25 AM, Najibullah Niazi <nniazi@usaid.gov> wrote:
Good Morning Harry,

Attached, please see the climate matrix. Your comments were addressed.

If you have any questions or comments let me know please.

Thank you.

Best,

Najib

On Tue, Jun 26, 2018 at 3:16 PM, Harry Bottenberg <hbottenberg@usaid.gov> wrote:
Here is the final version of the IEE Am. 1, I made some minor edits here and there (no track changes). We will add the climate matrix as Annex 1 once you are doing reviewing the climate matrix I sent earlier.

harry

On Tue, Jun 26, 2018 at 2:43 PM, Najibullah Niazi <nniazi@usaid.gov> wrote:
Hello Harry,

Thank so much for the edits. Attached, please see the cleared version of the IEE. Also I added Adam to the clearance list since he is the AO for the project. I will review the climate change matrix as well.