PROGRAMMATIC INITIAL ENVIRONMENTAL EXAMINATION (P-IEE)

PROJECT DATA:

Objective: DO 3: Social Sector Quality Improved  
Country/Region: Jordan  
Project Name: Improved Education and Youth Services Project  
Funding Period: October 2013 to December 2023

<table>
<thead>
<tr>
<th>Funding Begins:</th>
<th>IEE expiration date:</th>
<th>Life of Project (LOP) Amount:</th>
</tr>
</thead>
<tbody>
<tr>
<td>October 7, 2013</td>
<td>December 31, 2023</td>
<td>$596.7 million</td>
</tr>
</tbody>
</table>

IEE Amendment Drafted By: Christine Katin  
Date: March 24, 2019

IEE Amendment (Y/N): N  
If "Yes," Number & Date of Original IEE:

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

- Categorical Exclusion: [X]  
- Negative Determination with Conditions: [X]  
- Deferral:

1.0 BACKGROUND AND PROGRAM DESCRIPTION

1.1 Purpose and Scope of IEE

The purpose of this document, in accordance with Title 22, Code of Federal Regulations, Part 216 (22CFR216), is to provide a preliminary review of the reasonably foreseeable effects on the environment, as well as recommended Threshold Decisions for the USAID/Education and Youth (EDY) Improved Education and Youth Project Appraisal Document (PAD) and activities.

This Programmatic IEE provides a brief statement of the factual basis for Threshold Decisions as to whether an Environmental Assessment or an Environmental Impact Statement is required for the activities managed under this program. The activities under review are recommended for the threshold decisions indicated above as discussed in Section 4.0 "Recommended Threshold Decisions."

1.2 Background

The purpose of the USAID/EDY PAD, also known as "project," is to improve the quality of the social sector through more accountable and sustainable management of education (Intermediate Result 3.2 of the current USAID/Jordan Country Development Cooperation Strategy). The five-year project will consist of multiple interventions to achieve the following result:

- Learning outcomes for all students in Jordan improved.

The project will improve quality and increase access to formal and non-formal education systems and will enhance community and parental involvement. The project will also improve the pedagogy and the
inclusiveness of instruction as well as the physical learning environment. Finally, it will increase access to “Second Chance” programs and the number of non-school based non-formal education programs.

USAID/Jordan will achieve these results through the construction of new infrastructure and the improvement of existing infrastructure, demonstration of new technologies, and the provision of training and technical assistance.

1.3 Description of Activities

1.3.1 Current Activities

Activities under the EDY PAD are identified here by Sub-Intermediate Results (Sub-IRs) according to the current results framework, with current and pending mechanisms listed for each Sub-IR. Cases in which existing mechanisms and activities are covered under an already-approved IEE are indicated on the table. This Programmatic IEE (P-IEE) for the EDY PAD is intended to cover all project activities. Some activities are already ongoing under mechanisms with current IEEs. This Project-level IEE will cover future activities upon the expiration of the (old/current) IEEs listed below; it may also cover existing activities if extended beyond the life or cost ceiling of those existing IEEs. Therefore, by the end of the EDY Umbrella PAD lifetime, this Project-level IEE will be the sole environmental compliance document for all activities.

Table 1: List of Ongoing Interventions and Mechanisms under the EDY Umbrella PAD

<table>
<thead>
<tr>
<th>Sub-IR</th>
<th>Types of Interventions</th>
<th>Existing Mechanisms</th>
<th>Existing IEEs (if applicable) (expiration)¹</th>
</tr>
</thead>
</table>
| Sub-IR 3.2.1: Enhanced Enabling Environment for Quality Education. | • Strengthening the existing early education and classroom teacher programs by building the capacity of university professors and staff  
• Developing courses and course curriculum for pedagogy in non-education majors.  
• Establishing a scholarship program for high-performing high school students to enter education programs at Jordanian universities.  
• Conducting conferences to spread awareness of the impact of pre-service training on the delivery of quality education.  
• Teaching and community engagement at USAID newly constructed schools  
• Working with MOE and MPWH to improve the time and budget management and overall quality of the school environment in Jordan by building the planning, oversight and operation and maintenance. | • Pre-Service Professional Development  
• Support for structural MOE reforms through G2G mechanisms  
• Enhancing School Management and Planning (ESMP)  
• Cultivating Inclusive and Supportive Learning Environments (CISLE) | ME 18-25 (12/2023)  
ME 18-43 (12/31/2023)  
ME 16-49 (11/30/2020)  
ME-18-37 (07/2020) |

¹ IEE expiration date or end date of funding
- Developing an early grade reading and math diagnostic tool.
- Developing early grade reading and math remedial materials.
- Training teachers and school administrators on the use of the diagnostic tool and remedial materials.
- Building capacity of MOE to implement and sustain Early Grade Reading.
- Support for structural reforms to be developed in a planned consultative process led by the MOE and including other stakeholders.
- Support for structural reforms through G2G mechanisms.
- Supporting community out-of-school reading and math events and activities.
- Conducting activities to give parents the skills to engage their children in reading and math.
- Public education and media campaigns to promote reading and math, and impact education attitude changes at the household level.
- Support for community school activities through established parent-teacher-school mechanisms.
- Training teachers on the psychosocial and pedagogical skills needed to address the needs of refugee students.

| Sub-IR 3.2.2: Equitable Access to Quality Education and Learning Environment for All Students. | Early Grade Reading and Math (ME 15-14) (12/2019) |
| | Learning Environment Improved Infrastructure (LEIIP) (ME 18-39) (04/2019) |
| | Jordan School Expansion (ME 13-107) (04/2019) |
| | Schools for Knowledge (SKEP) |
| | Furniture and Equipment Procurement for Schools |
| | Non-Formal Education (NFE) (ME 18-38) (11/2020) |
| Sub IR 3.2.3: Improved Opportunity, Well-being and Civic Engagement for Youth. | • Supporting local NGO “second chance” programs at the community level.  
• Supporting Public Private Partnerships to secure advanced training opportunities for the youth.  
• Supporting activities that broaden boys and girls experiences and promote civic values.  
• Supporting mentoring and tutoring programs. | • Multi-Donor Humanitarian Trust Fund | ME 18-11  
(09/2018 funding end - 06/2019 activity ends) |

| Sub IR 3.2.3: Youth Power Jordan  
(3/2022) | • Youth Power Jordan  
(3/2022) | • Youth Power Jordan  
(3/2022) | • Youth Power Jordan  
(3/2022) |
• Training parents in dealing with at-risk youth.
• Providing counseling for parents on family-specific at-risk youth issues.
• Assisting the MOE with data collection and assess needs at the level of the central MOE to effectively track at-risk students and identify those students who have left school permanently.

1.3.2 New Activities to be Included in the EDY PAD IEE

Table 2: Planned activities and mechanisms under the EDY PAD

<table>
<thead>
<tr>
<th>Sub-IR</th>
<th>New Mechanism in Design (Anticipated award date)</th>
<th>Types of Interventions</th>
<th>Recommended Threshold Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sub-IR 3.2.1: Enhanced Enabling Environment for Quality Education.</td>
<td>N/A</td>
<td></td>
<td></td>
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<tr>
<td>Sub-IR 3.2.2: Equitable Access to Quality Education and Learning Environment for All Students.</td>
<td>• Architecture and Engineering Services Indefinite Delivery Indefinite Quantity Local Contract (est. Jan 2020-Dec 2023)</td>
<td>• Planning activities such as collection and review of information, meetings, and analysis</td>
<td>Categorical Exclusion per 22 CFR 216.2(c)(2)(iii)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• MOE, MPWH, MOH Capacity Building in the areas of school planning, design, utilization, operation, and maintenance.</td>
<td>Categorical Exclusion per 22 CFR 216.2(c)(2)(i)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Preparation of architect/engineering designs and services related to construction supervision</td>
<td>Negative Determination with Conditions</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Collection and review of information, workshops, meetings, and training programs (this component may be part of all EDY school construction activities)</td>
<td>Categorical Exclusion per 22 CFR 216.2(c)(2)(i)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Monitor and supervision of construction contract implementation</td>
<td>Negative Determination with Conditions</td>
</tr>
<tr>
<td></td>
<td>• Furniture and equipment for schools and other facilities (New Jordan Schools Project, may be procured through A&amp;E Services Mechanism)</td>
<td>• General furniture and equipment for schools and health facilities</td>
<td>Categorical Exclusion per 22 CFR 216.2(c)(2)(i)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Procurement of lab equipment and materials for instructional</td>
<td>Negative Determination</td>
</tr>
</tbody>
</table>
USAID/Jordan's New School Construction and Rehabilitation Project includes technical assistance, construction activities, and procurement of furnishings and equipment. Through USAID host country contracting, MPWH will implement the actual construction and rehabilitation works through a number of contracts with local construction contractors. The construction will be implemented according to the designs prepared by USAID’s Architecture and Engineering (A&E) contractor, and the A&E firm will assist USAID and MPWH by providing construction supervision services for these host country contracts. The findings for each major category of activities are summarized below. Activities such as collection and review of information, workshops, meetings, and training programs which may fall under each of these tasks are recommended for Categorical Exclusion per 22 CFR 216.2(c)(2)(i) as "education, technical assistance, or training programs" and per 22 CFR 216.2(c)(2)(iii) as "analyses, studies, academic or research workshops and meetings."

The new Architecture and Engineering (A&E) services activity will provide full packages of planning, architect/engineering design, and construction supervision to support the construction of new schools and classrooms, rehabilitation of existing schools and sports facilities, and other vertical structures and assessments as determined through individual task orders (e.g., hospital design and construction management services). Planning activities such as collection and review of information, meetings, and analysis are recommended for a Categorical Exclusion per 22 CFR 216.2(c)(2)(iii). Capacity building activities are also recommended for a Categorical Exclusion per 22 CFR 216.2(c)(2)(iii). Preparation of architect/engineering designs and activities to monitor and supervise the implementation of the construction contracts are recommended for Negative Determination with Conditions. The conditions are for the A&E services contractor to ensure compliance with any Environmental Assessment (EA) recommendations, ensure implementation of environmentally sound designs, ensure use of an Environmental Mitigation and Monitoring Plan (EMMP) when required, ensure use of best management practice (BMPs) to minimize dust, noise, debris, waste production, flooding, traffic disturbance, risks to workers and community safety, and to properly dispose of debris and waste. BMPs are detailed in Sector Environmental Guidelines for Construction (http://www.usaidgems.org/Sectors/construction.htm), which provides additional reference materials on occupational safety and health, and Chapter 18: Primary and Secondary Day Schools (http://www.encapafrica.org/sectors/schools.htm), where relevant.

Furniture and Equipment Procurement for construction and rehabilitation of new schools, classrooms, and other facilities supported by USAID/Jordan. The majority of the furniture and equipment being procured, such as basic school/clinic furniture, computers, printers, and maintenance equipment, is recommended for Categorical Exclusion per 22 CFR 216.2(c)(2)(i). However, where activities include the procurement of lab equipment and materials for instructional purposes in the chemistry and biology labs, a Negative Determination with Conditions is recommended per 22 CFR 216.3(a)(3). The conditions are to use BMPs for safe storage, handling, and disposal of any laboratory chemicals per country MOE standards. The mechanism for future furniture and equipment procurement is to be determined, but
furniture and equipment design and procurement may be ordered through the A&E services activity currently in design.

**USAID/Jordan support to Ministry of Youth through G2G Mechanisms** will provide capacity building for Ministry of Youth Staff and equip a number of Youth Centers possibly with furniture and computers. This activity is recommended for **Categorical Exclusion** per 22 CFR 216.2 (c)(2)(i) as the activities consist of capacity-building workshops, furnishing and meetings.

Monitoring and evaluation is addressed in Section 5.0 of the P-IEE.

### 2.0 COUNTRY AND ENVIRONMENTAL INFORMATION

#### 2.1 National Environmental Policies and Procedures of Jordan

Jordanian laws include the Environment Protection Law No.6 of 2017, which contains 32 articles that include definitions, general principles, objectives, and duties and powers of the Ministry of Environment. It also sets the principles for cooperation and coordination between the Ministry and local, regional, and international organizations that work in the environment field in order to achieve the goals of protecting the environment and to improve its various elements in a sustainable manner.

As per Article 4 of this Law, the Ministry’s duties are:

- Developing a general policy to protect the environment and preparation of various plans, programs and projects necessary to achieve sustainable development.
- Drafting the specifications and standards for the various elements of the environment. Monitoring and measuring the elements of the environment and its components, and, monitoring and supervising the public and private corporations, companies, and projects. The purpose of this function is to ensure compliance with environmental specifications and standards. This function is done in coordination with competent scientific centers and labs authorized by the Ministry.
- Issuing environmental instructions, pursuant to this law, to protect the environment and its elements and setting the licensing conditions for the establishment of entities (i.e. companies, projects) operating in various economic sectors including, but not limited to, agriculture, industrial, mining, and others.
- Setting the principles for handling harmful and hazardous material to the environment. This includes classifications, collection, transportation, storage, destruction and disposal. A specific regulation shall be drafted for this purpose.
- Approving the establishment of nature reserves and national parks and supervising and monitoring their management.
- Preparing environmental emergency plans.
- Conducting environment related research and studies and issuing publications related to the environment including State of the Environment reports.
- Strengthening the relationship between the Kingdom and Arab, regional, and international states and concerned authorities and organizations in matters related to protecting the environment. In addition, enhancing cooperation in implementing international environment-related conventions and agreements.

The conservation of biodiversity plays a fundamental role in sustainable development. As such, The U.S. Foreign Assistance Act (FAA) of 1961, as amended by Sections 118 and 119, requires that all USAID Missions conduct a periodic country analysis of the conservation and sustainable use of biological diversity. These analyses can help inform project design and implementation.

The USAID/Jordan Biodiversity (118/119) Assessment has information that can be accessed at the
3.0 EVALUATION OF PROJECT ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

While development activities are intended to provide benefits for targeted recipients, when managed ineffectively they may cause adverse impacts that can offset or eliminate the intended benefits. Impacts can be direct, indirect, or cumulative. They can also be beneficial or negative. The USAID Sector Environmental Guidelines are good resources on potential impacts for specific sectors. The following link is to all sector guidelines:

http://www.usaidgems.org/sectorGuidelines.htm

The following are potential environmental impacts for the respective sectors that are related to the scope of this P-IEE. Mitigation measures are discussed in Section 5.

Construction:

• DAMAGE TO SENSITIVE OR VALUABLE ECOSYSTEMS - Construction in wetlands, estuaries or other sensitive ecosystems may destroy or significantly damage exceptional natural resources and the benefits they provide. This damage may reduce economic productivity, impair essential ecosystem services (such as flood control, which may become increasingly important in some areas as climate change impacts precipitation patterns, or breeding habitat for fish that are caught for food), or degrade the recreational value of these resources.

• SOIL COMPACTION AND GRADING OF THE SITE MAY ALTER DRAINAGE PATTERNS AND WATER TABLES - changing access to water by animals, people and vegetation may degrade water resources as well. Improper extraction of construction materials such as wood, stone, gravel, or clay may damage terrestrial ecosystems (e.g., wood may come from relatively undisturbed forest).

• SEDIMENTATION OF SURFACE WATERS - Removal of natural land cover, excavation, extraction of construction materials and other construction-related activities can result in soil erosion. Erosion can, in turn, lead to sedimentation in receiving waters. Sedimentation may reduce the capacity of ponds and reservoirs, increasing flood potential, or substantially alter aquatic ecosystems by changing streambed, lakebed and estuary conditions.

• CONTAMINATION OF GROUND AND WATER SUPPLIES - Toxic materials are often used in construction. Examples include solvents, paints, vehicle maintenance fluids (oil, coolant), and diesel fuel. If these are dumped on the ground or wash into streams they may contaminate ground or surface water supplies. This may harm the health of the local community, as well as populations living down gradient and downstream. Aquatic and terrestrial ecosystems may also be damaged. Where sanitary facilities for construction crews are inadequate, human waste may contaminate water resources.

• ADVERSE SOCIAL IMPACTS - Construction may displace local inhabitants, or reduce their access to environmental resources. Construction on or near culturally important sites (cemeteries, worshping areas, meeting places) may generate conflict with the local community. If the new facility provides a valuable service not available elsewhere, it may cause migration to the area. Noise and dirt from the site may disturb neighbors. If local labor is not used, this may also generate resentment. In addition, construction may impose risks to occupational health and safety of workers, particularly unskilled or temporary workers.
4.1 CATEGORICAL EXCLUSION

The following activities under the EDY Umbrella PAD will not have an adverse effect on the natural or physical environment, or are otherwise excluded, as they meet the criteria for Categorical Exclusion from the procedures under 22 CFR 216.3, as set forth in 22 CFR 216.2(c)(2)(i), (iii), (v), and (xiv) under the following classes of actions:

a) Technical assistance, education and training, except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.) [216.2(c)(2)(i)];
b) Analyses, studies, academic or research meetings and workshops [216.2(c)(2)(iii)];
c) Document and information transfer [216.2(c)(2)(v)]; and
d) Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.) [216.2(c)(2)(xiv)].

Proposed EDY PAD activities under review that meet criteria for a Categorical Exclusion include:

- Developing and updating policy frameworks, as necessary, to guide teacher education programs.
- Strengthening the capacity of universities to deliver quality pre-service teacher education.
- Strengthening the practicum students undergo to become teachers.
- Enforcing and strengthening the new practices through onsite teacher support and coaching activities.
- Building support at the school and directorate level through awareness workshops.
- Strengthening community-school support connections to implement and institutionalize sustainable learning and extracurricular programs within schools.
- Increasing community awareness, responsibility and advocacy for participation in education.
- Contracting professional services of an architectural or engineering nature, which are required to be performed or approved by a person licensed, registered, or certified to provide those services (including studies, investigations, surveying and mapping, tests, evaluations, consultations, comprehensive planning, program management, conceptual designs, plans and specifications, value engineering, construction phase services, soils engineering, design drawings reviews, peer reviews, preparation of operating and maintenance manuals, and other related services.)
- Planning activities associated with A&E services such as collection and review of information, meetings, and analysis.
- Preparing feasibility studies, master plans, conceptual designs specifications, cost estimates and final designs.
- Providing technical assistance for policy reform, capacity building, civil society outreach, and institutional strengthening.
- Conducting surveys and site visits.
- Printing and disseminating activity and monitoring and evaluation reports.
- Planning and logistics for partner, donor, and stakeholder collaboration meetings and public events.
- Procuring School Furniture and Equipment for schools.
- Jordan Compact Education Fund (JCEF), a multi-donor, pooled funding mechanism which addresses the enrollment of Syrian students in public.
- Activities envisioned under the non-formal education program (NFE) award consist mainly of technical assistance, training, and capacity building.
4.2 NEGATIVE DETERMINATION WITH CONDITIONS

Activities with potential impacts to the environment under the following sectors are recommended for a Negative Determination with Conditions threshold determination. It is anticipated that the majority of the construction activities related to Education and Youth activities will fall under this category (Negative Determination with Conditions). When implemented ineffectively, these activities may cause adverse impacts that can offset or eliminate the intended benefits. Mitigating environmental impacts with these activities requires a participatory approach to activity design and management. Strong technical design of the projects is also critical.

These activities include:

- Procurement of lab equipment and materials for instructional purposes in the chemistry and biology labs.
- Small-scale construction, i.e. school and hospital rehabilitation, expansion, and construction, as well as construction of small to moderately sized buildings.
- Contracts for architect/engineering designs and services related to supervision and monitoring of construction contracts to ensure compliance with environmental requirements.

The conditions are for the A&E services contractor to ensure compliance with any Environmental Assessment (EA) recommendations, ensure implementation of environmentally sound designs, ensure use of an Environmental Mitigation and Monitoring Plan (EMMP) when required, ensure use of best management practice (BMPs) to minimize dust, noise, debris, waste production, flooding, traffic disturbance, risks to workers and community safety, and to properly dispose of debris and waste.

4.3 POSITIVE DETERMINATION

The following action(s) under review are recommended for a positive determination, actions that may have significant effect on the environment and an Environmental Assessment or Environmental Impact Statement, as appropriate, will be required:

- Construction of new schools and new educational facilities.

The MEO will determine which activities qualify for a Positive Determination. After the Bureau Environment Officer (BEO) has concurred with a Positive Threshold Decision, the originator of the action shall commence the process of identifying the significant issues relating to the proposed action and of determining the scope of the issues to be addressed in an Environmental Assessment or Environmental Impact Statement. The originator of an action within the positive classes of actions identified above shall commence this scoping process as soon as practicable. Persons having expertise relevant to the environmental aspects of the proposed action shall also participate in this scoping process. (Participants may include, but are not limited to, representatives of host governments, public and private institutions, and USAID Mission staff and contractors.) This process shall result in a written statement which shall include the following matters:

1. A determination of the scope and significance of issues to be analyzed in the Environmental Assessment or Impact Statement, including direct and indirect effects of the project on the environment.
2. Identification and elimination from detailed study of the issues that are not significant or have been covered by earlier environmental review, or approved design considerations, narrowing the discussion of these issues to a brief presentation of why they will not have a significant effect on the environment.
3. A description of:
   a) the timing of the preparation of environmental analyses, including phasing if appropriate,
b) variations required in the format of the Environmental Assessment, and

c) the tentative planning and decision-making schedule; and

d) how the analysis will be conducted and the disciplines that will participate in the analysis.

These written statements shall be reviewed and approved by the BEO.

*Circulation of Scoping Statement.* To assist in the preparation of an Environmental Assessment, the BEO may circulate copies of the written statement, together with a request for written comments, within thirty days, to selected federal agencies if the Officer believes comments by such federal agencies will be useful in the preparation of an Environmental Assessment. Comments received from reviewing federal agencies will be considered in the preparation of the Environmental Assessment and in the formulation of the design and implementation of the project, and will, together with the scoping statement, be included in the project file.

*Change in Threshold Decision.* If it becomes evident that the action will not have a significant effect on the environment (i.e., will not cause significant harm to the environment), the Positive Threshold Decision may be withdrawn with the concurrence of the BEO. In the case of an action included in §216.2(d)(2), the request for withdrawal shall be made to the BEO.

5.0 MITIGATION, MONITORING, AND EVALUATION

5.1 CONDITIONS TO AVOID OR MITIGATE ADVERSE ENVIRONMENTAL IMPACTS

**Construction:**
- Practice Environmentally and Socially Responsible Construction Contracting. Achieving environmentally sound design and implementation of any development activity is far more likely when the contract or agreement governing the activity mandates good environmental practices and compliance, and appropriate capabilities are required of activity implementers.
- Responsible Contracting Language. When construction is undertaken by subcontractors within a larger project, responsible contracting needs to start at the top. That is, it needs to be mandated in the contract or agreement governing the overall project. The lead implementing organization then "pushes" responsible contracting down to the subcontracts it executes with construction firms. Basic responsible construction contracting language in the contract or agreement governing the overall project could take the following form:
  - Construction subcontractors must comply with applicable host country environment, health, and safety requirements.
  - To be awarded construction work under this project, prospective subcontractors must demonstrate a record of environment, health, and safety (EHS) compliance and evidence of commitment and capability to implement good EHS practice. Compensation must be tied in part to EHS performance.
  - The lead implementing organization must actively monitor subcontractor EHS Performance.
  - Activity design and implementation should factor in climate change (guidance on this can be found in Section 5.2).

**A&E Monitoring Requirements:**
The A&E contractors are required to monitor and evaluate the project's success against benchmarks. The A&E contractors will carry out the following monitoring actions related to activities in this P-IEE:
- During the A&E design phase, the A&E contractors will specify the use of environmentally appropriate materials and will ensure that their designs comply with the recommendations of this IEE and the EA.
- Based on the environmental checklist, an EMMP will be approved by the COR and MEO prior to
the start of activities on the ground.

- During construction, the construction contractors and the A&E contractors providing construction supervision services will monitor activities to ensure that the recommended mitigation measures are incorporated into the work, and/or conduct additional monitoring and mitigation as required.
- The A&E contractors and/or construction contractors will take responsibility for coordinating any remedial actions.
- Upon completion of each activity, the construction contractors will formally notify all relevant authorities that they are officially responsible for implementing the maintenance program.
- The A&E contractors and construction contractors will comply with all applicable Government of Jordan EHS regulations and standards; obligations of applicable international environmental agreements and conventions; and international best practice acceptable to USAID.
- For furniture and equipment, the A&E contractors providing construction supervision services will ensure that the specifications, handling, and storage comply with the recommendations of this IEE.

Additional best practices can be found at the Sector Environmental Guidelines for Construction.²

5.2 CLIMATE RISK MANAGEMENT

As per the ADS 201mal and the Executive Order on "Climate-Resilient International Development," USAID should factor climate resilience into international development programs and investments. Activities under the EDY PAD approved before October 1, 2016, are exempt from the Climate Risk Screening requirement. The activity design team identified expected climate risks to successful implementation over the life of new activities¹ in the attached Annex 1. The climate risk screening found risks ranked LOW and HIGH; of note are construction-related activities which are always ranked HIGH.

Expected climate change impacts and associated risks over the life of the project’s expected benefits/results include:

- INCREASE IN TEMPERATURE: Projections for changes in temperature in the eastern Mediterranean vary depending on the climate model. However, overall, temperatures are projected to increase by approximately 3.5-5°C by the end of the century, in comparison with the 1961-1990 base periods, with warming stronger in the summer than in the winter.
- DECREASE AND VARIABILITY IN PRECIPITATION: Precipitation is expected to decrease and to exhibit more seasonal variation over the course of this century. According to the Intergovernmental Panel on Climate Change, annual precipitation in the eastern Mediterranean is projected to decrease by 10 percent by 2020 and by 20 percent by 2050.
- INCREASE IN EXTREME EVENTS: An increase in drought events during the summer seasons, heat waves, more drastic changes in temperature, and more intense rainfall events are expected throughout this century.

RISKS DUE TO CLIMATE IMPACTS: The gradual change in climate effects over time such as declining annual precipitation and warmer temperatures, in addition to more extreme weather events, will increase stresses on vital infrastructure systems (e.g., schools and health facilities) in which USAID/Jordan invests. New investments must adapt to the changing conditions through corresponding changes in infrastructure design and construction.

At the project level, new activities with potential climate impacts will include A&E design and

construction. Potential impacts include changes in the timing or length of construction shifts and work seasons or changes in ongoing staff management due to health impacts to construction crews or other staff from heat stress. Damage to infrastructure itself, including school buildings, can disproportionately impact marginalized populations by reducing students’ access to education.

The Mission will ensure that potential climate-related risks will be screened, and properly addressed, at the activity level for new activities, i.e., for each construction investment, during the planning and activity design phase. In particular, the formal architecture and engineering (A&E) plans will define the parameters of the (individual) infrastructure activities as necessary; therefore, detailed risk assessments and the processes for integrating climate change considerations into construction activities will be part of the A&E design phase. This responsibility is thereby outsourced (allocated) to the designer of record, the A&E firm.

The Mission shall ensure that procurement documents, agreements, and/or contracts for construction projects include requirements to conduct appropriate A&E design and risk management procedures that include climate change considerations. For example, the A&E firm can address climate risks through:

- Designing infrastructure to hold up to more extreme events (e.g. 100-year flood) based on updated data and climate-impact models; construction and infrastructure projects are particularly vulnerable to heavy rainfall and flooding events.
- Working with the relevant Ministries or GOJ counterparts to survey infrastructure to assess climate risk before designs are completed.
- Develop or update disaster management plans for infrastructure with regards to climate risks.

5.3 MONITORING AND IMPLEMENTATION

In addition to the specific conditions enumerated in Section 5.1, the threshold determinations recommended are contingent on full implementation of the following monitoring and implementation requirements:

USAID Requirements:

A. Environmental compliance actions and results in USAID solicitations and awards. The Contract/Agreement Officer will include language and reference to this P-IEE in appropriate solicitations and awards. Suggested language for use in solicitation and awards can be found at the following link: http://www.usaid.gov/ads/policy/200/204sac

B. Implementing Partner (IP) Briefings on Environmental Compliance Responsibilities. The Contract/Agreement Officer’s Representative (C/AOR) will provide the IP with a copy of this P-IEE; the IP will be briefed on their environmental compliance responsibilities by their C/AOR. During this briefing, the P-IEE conditions applicable to the IP’s activities will be identified.

C. Compliance Monitoring. As required by ADS 204.3.4, USAID will actively monitor and evaluate, by means of desktop reviews and site visits, whether there are new or unforeseen consequences arising during implementation that were not identified and reviewed in accordance with 22 CFR 216 (Reg. 216). USAID will also monitor the need for additional review. If additional activities not described in this document are added to this program, an amended environmental examination will be prepared in a timely manner and approved.

D. Compliance Reporting. A summary report of Mission’s compliance relative to this P-IEE will 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. The REA, BEO, and/or his/her designated representative may conduct site visits or request additional information for compliance monitoring purposes.

Implementing Partner (IP) Requirements:
E. Development of Environmental Mitigation and Monitoring Plan (EMMP). For activities that are "Negative Determination with Conditions", i.e. subject to one or more conditions set out in the "Recommended Threshold Decision" section of this P-IEE, the IP will develop and provide an EMMP for USAID C/AOR review and approval, documenting how their project will implement and verify all P-IEE conditions that apply to their activities. The EMMP will also identify how the IP will assure that P-IEE conditions that apply to activities supported under subcontracts and sub-grants are implemented. (In the case of large sub-grants or subcontracts, the IP may elect to require the sub-grantee/subcontractor to develop their own EMMP.)

F. Integration and implementation of EMMP. The IP will integrate the EMMP into their award work plan and budgets, implement the EMMP, and report on its implementation as an element of regular technical/award performance. The IP will ensure that sub-contractors and sub-grantees integrate implementation of P-IEE conditions, where applicable, into their own activity work plans and budgets and report on their implementation as an element of sub-contract or grant performance reporting.

G. Integration of environmental compliance responsibilities in sub-contracts and grant agreements. The IP will ensure that subcontracts and sub-grant agreements reference and require compliance with relevant elements of the P-IEE and any attendant conditions.

H. Assurance of sub-grantee and sub-contractor capacity and compliance. The IP will ensure that sub-grantees and subcontractors have the capability to implement the relevant requirements of this P-IEE. The IP will, as and if appropriate, provide training to sub-grantees and sub-contractors in their environmental compliance responsibilities and in environmentally sound design and management of their activities.

I. New or modified activities. As part of its initial Work Plan, and all Annual Work Plans thereafter, the IP, in collaboration with their C/AOR, shall review all planned and ongoing activities to determine if they are within the scope of this P-IEE. If any IP activities are planned that would be outside the scope of this P-IEE, an amendment to this P-IEE addressing these activities will be prepared for USAID review and approval. No such new activities will be undertaken prior to formal approval of this amendment. Any ongoing activities found to be outside the scope of the approved Reg. 216 environmental documentation will be halted until an amendment to the documentation is submitted and written approval is received from USAID. This includes activities that were previously within the scope of the P-IEE, but were modified in such a way that they move outside of the scope.

J. Compliance with Host Country Requirements. Nothing in this P-IEE substitutes for or supersedes IP, sub-grantee and subcontractor responsibility for compliance with all applicable host country laws and regulations for all host countries in which activities will be conducted under the USAID activity. The IP, sub-grantees, and subcontractor must comply with each host country’s environmental regulations unless otherwise directed in writing by USAID. However, in case of conflict between host country and USAID regulations, the latter shall govern.

K. Compliance Reporting. IPs will report on environmental compliance requirements as part of their routine performance reporting to USAID. The A&E contractors will undertake reporting on environmental compliance throughout the completion of all activities in this program. Such reporting will be included in the quarterly progress reports and final report. Reporting will include photographic documentation and site visit reports which fully document that all proposed mitigation actions were followed throughout implementation of the subject work. All such reports and documentation will be submitted to the COR and MEO.

6.0 REVISIONS AND LIMITATIONS

This P-IEE does not cover activities (and therefore should changes in scope implicate any of the issues/activities below, a BEO-approved amendment shall be required) that:

- Affect endangered species;
EDY PAD P-IEE

- Result in wetland or biodiversity degradation or loss;
- Support extractive industries (e.g., mining and quarrying);
- Promote timber harvesting;
- Provide support for regulatory permitting;
- Result in privatization of industrial or infrastructure facilities;
- DCA or ODA programs.
- Assist the procurement of (including payment in kind, donations, guarantees of credit) or use (including handling, transport, fuel for transport, storage, mixing, loading, application, cleanup of spray equipment, and disposal) of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials and/or pesticides (cover all insecticides, fungicides, rodenticides, etc. covered under the Federal Insecticide, Fungicide, and Rodenticide Act;
- Procure or use Asbestos, Lead, Mercury Containing Materials (ALMCM) (i.e., piping, roofing, etc.), Polychlorinated Biphenyl (PCB) containing transformers, or other hazardous/toxic materials for construction activities; and
- Assist, procure, or use genetically modified organisms (GMOs,) which shall cause preparation of biosafety assessment (review) in accordance with ADS 201.3.12.2(b).

If during implementation, project activities are considered outside of those described in this document, an amendment shall be submitted. Pursuant to 22CFR 21 6.3(a)(9), if new activities are added and/or information becomes available which indicates that activities to be funded by the project might be "major" and the project's effect "significant," this determination will be reviewed and revised by the C/AOR of the project, and submitted to the MEO and BEO for approval and, if appropriate, an environmental assessment will be prepared. It is the responsibility of the C/AOR to keep the Mission Environmental Officer and the BEO informed of any new information or changes in the activity that might require revision of the P-IEE.
APPROVAL OF PROGRAMMATIC INITIAL ENVIRONMENTAL EXAMINATION – EDY UMBRELLA PAD

CLEARANCE:
Office Director, EDY
Christine Page

Program Officer
Jessica Morrison

Mission Environment Officer
Haithem Ali

Legal Advisor
Ian Robertson

Regional Environmental Advisor
Suzanne Ebert

Deputy Mission Director
Nancy J. Eslick

APPROVAL:
Mission Director
Jim Barnhart

CONCURRENCE:
Bureau Environmental Officer
John Wilson

Approved: ☑
Disapproved: □

Date