REQUEST FOR CATEGORICAL EXCLUSION

ACTIVITY DATA

Activity Name: Establishing a Regulatory Framework for Agricultural Commodities Market in Liberia Activity (LACRA)
Amendment (Y/N): N
Geographic Location(s) (Country/Region): Liberia
Implementation Start/End: September 2019/December 2019
Solicitation/Contract/Award Number:
Implementing Partner(s): TBD

ORGANIZATIONAL/ADMINISTRATIVE DATA

Implementing Operating Unit(s): (e.g. Mission or Bureau or Office) USAID/Liberia
Funding Operating Unit(s): (e.g. Mission or Bureau or Office) USAID/Liberia
Funding Account(s): Economic Growth
Funding Amount: $175,000.00
Amendment Funding Date: Amendment Funding Amount: 
Other Affected Unit(s): None
Lead BEO Bureau:
Prepared by: Maurice Ogutu
Date Prepared: 08/20/2019

ENVIRONMENTAL COMPLIANCE REVIEW DATA

Analysis Type: Request for Categorical Exclusion
Environmental Determination(s): Categorical Exclusion
Categorical Exclusion Expiration Date: 8/31/2021
Additional Analyses/Reporting Required:
Climate Risks Identified (#): Low _1_____ Moderate _NA__ High _NA__
Climate Risks Addressed (#): Low _1_____ Moderate _NA__ High _NA__
THRESHOLD DECISION MEMO AND SUMMARY OF FINDINGS

PURPOSE AND SCOPE OF THE REQUEST FOR CATEGORICAL EXCLUSION
This RCE will make a determination regarding USAID/Liberia funded Establishing a Regulatory Framework for Agricultural Commodities Market in Liberia (RFACM) activity to be implemented as a contract by an implementing partner to be determined. The $175,000 USAID funding comes from FY 2013/2014, 2016/2017 and 2017/2018 Economic Growth Program Design and Learning (Program Area A26 and PO.1) funds.

The RFACM goal is to support the Liberia Agricultural Commodities Regulatory Authority (LACRA) to develop a regulatory framework for trade in agricultural commodities in Liberia. The recommendations from this activity will be used to strengthen LACRA to guide the development and growth of agricultural commodity markets. The assessment will be conducted mainly in the zone of influence counties, including Bong, Grand Bassa, Lofa, Nimba, Margibi, and Montserrado. However, the assessment may cover other counties where necessary. USAID/Liberia funds will be used to fund all the costs of this activity.

ACTIVITY SUMMARY
Establishing a Regulatory Framework for Agricultural Commodities Market in Liberia (RFACM) activity with an implementing partner to be determined and funded by USAID/Liberia goal is to support LACRA. LACRA is a GOL agency mandated to regulate agricultural commodities markets in Liberia to develop a regulatory framework for trade in agricultural commodities to increase incomes and create employment opportunities. The activity results will be utilized by LACRA to provide guidance to the development of agricultural commodity markets in Liberia.

The activity will involve desk reviews, interviews, data collection, data analysis, and reports. The activity will be implemented in the zone of influence counties but may cover all counties in Liberia when necessary and will have no direct environmental impact. This RCE does not have a direct relationship with other RCEs/IEEs at the Mission.

ENVIRONMENTAL DETERMINATIONS
The tasks described above justify Categorical Exclusions, pursuant to 22 CFR §216.2(c)(2), for which an Initial Environmental Examination (IEE), or an Environmental Assessment are not required because the actions do not have an effect on the natural or physical environment.

Project interventions, as currently planned, fall into the following classes of action:

- §216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings
- §216.2(c)(2)(v) Document and information transfers
- §216.2(c)(2)(xiv) 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.) Upon approval of this document, the determinations become affirmed, per Agency regulations (22CFR216).
The following table summarizes the environmental determinations applicable to the specific projects/activities:

**TABLE 1: ENVIRONMENTAL DETERMINATIONS**

<table>
<thead>
<tr>
<th>Activity and Sub-Activity #</th>
<th>Recommended Determination for Categorical Exclusion</th>
<th>Deferral</th>
</tr>
</thead>
<tbody>
<tr>
<td>Establishing a Regulatory Framework for Agricultural Commodities Market in Liberia (RFACM)</td>
<td>§216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings</td>
<td></td>
</tr>
<tr>
<td>Sub-activity 1.1: Preparations for the assessment – Desk review</td>
<td>§216.2(c)(2)(v) Document and information transfers</td>
<td></td>
</tr>
<tr>
<td>Sub-activity 1.2: Assessment of the performance of agricultural markets</td>
<td>§216.2(c)(2)(xiv) 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.)</td>
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<tr>
<td>Sub-activity 1.3: Assessment of LACRA’s capacity to regulate markets</td>
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</tr>
<tr>
<td>Sub-activity 1.4: Assessment for effective GOL warehouse use options</td>
<td></td>
<td></td>
</tr>
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</table>

**CLIMATE RISK MANAGEMENT**

The change in weather associated with heavy rainfall causing roads to become impassable is the potential climate risk that may affect this activity. The implementing partner will start field work in counties with roads that are passable during the rainy season. The implementing partner has prepared a logistical contingency plan to respond to adverse weather, including heavy rainfall, during the assessment, which mitigates the climate risk.

**BEO SPECIFIED CONDITIONS OF APPROVAL**

N/A

**IMPLEMENTATION**

In accordance with 22CFR216 and Agency policy, the conditions and requirements of this document become mandatory upon approval. This includes the relevant limitations, conditions and requirements in this document as stated in Section 3 of this RCE and any BEO Specified Conditions of Approval.
USAID Approval Of Request For Categorical Exclusion

PROJECT/ACTIVITY NAME: Establishing a Regulatory Framework for Agricultural Commodities Market in Liberia (RFACM)

(The routing process and associated signature blocks may be customized by Bureau or Mission. Please follow Bureau- or Mission-specific guidance. Include signature blocks in accordance with Bureau and/or Mission policy. At a minimum include the noted required signatures. Add/Delete other signature blocks as necessary.)

Approval: Sara Walter, Mission Director 9/16/2019
Clearance: Rebekah Eubanks, Deputy Mission Director 7/5/2019
Clearance: Maurice Ogutu 8/28/19
Clearance: Kokulo Yongbor Jr, Mission Environmental Officer 9/3/2019
Clearance: Ian Winborne, Mission Climate Integration Lead 9/3/2019
Clearance: Maurice Ogutu, Acting Team Lead 8/28/2019
Clearance: Alexis Rolter, Supervisory Program Officer, PPD 8/31/19
Clearance: Ronald Wiebecha, Regional Legal Officer 9/9/19
Clearance: Henry Aryee, Regional Environmental Advisor 10/16/2019
Concurrence: Brian Hirsch, Africa Bureau Environmental Officer 10/17/2019

DISTRIBUTION: [Distribution lists may be customized by Bureau or Mission. Please follow Bureau- or Mission-specific guidance.]
1.0 ACTIVITY DESCRIPTION

1.1 PURPOSE AND SCOPE OF RCE
The purpose of this document is to establish that all proposed projects/activities belong to classes of actions eligible for Categorical Exclusions as set out in Agency regulations (22CFR 216.2(c)) and that there are no foreseeable significant direct or indirect impacts that would preclude them from receiving a Categorical Exclusion. Upon approval of this document, the Categorical Exclusions are affirmed for the project/activity. This analysis also documents the results of the project/activity level Climate Risk Management process in accordance with USAID policy (specifically, ADS 201 mandatory reference 201mal). This RCE is a critical element of a mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation.

1.2 ACTIVITY OVERVIEW
The Establishing a Regulatory Framework for Agricultural Commodities Market in Liberia (RFACM) activity whose implementing partner is to be determined will involve preparations, data collection, data analysis, and reporting of the results. The assessment will be conducted in the zone of influence counties but can be extended to other counties nationwide when necessary. The activity will be implemented between September 2019 and December 2019. USAID resources will be used to fund the activity is $175,000.

1.3 ACTIVITY DESCRIPTION
The Establishing a Regulatory Framework for Agricultural Commodities Market in Liberia (RFACM) activity is to be funded by USAID. The RFACM goal is to support the Liberia Agricultural Commodities Regulatory Authority (LACRA) to develop a regulatory framework for trade in agricultural commodities in Liberia. The activity will be implemented in all counties with special focus to the zone of influence. The recommendations from this activity will be used to strengthen LACRA to guide the development and growth of agricultural commodity markets in Liberia.

TABLE 2: DEFINED OR ILLUSTRATIVE ACTIVITIES AND SUB-ACTIVITIES

<table>
<thead>
<tr>
<th>Project/Activity</th>
<th>Establishing a Regulatory Framework for Agricultural Commodities Market in Liberia</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sub-activity 1.1</td>
<td>Preparations for the assessment – Desk review</td>
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<td>Sub-activity 1.4</td>
<td>Assessment for effective GOL warehouse use options</td>
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2.0 ENVIRONMENTAL ANALYSIS

2.1 JUSTIFICATION FOR CATEGORICAL EXCLUSION
The activities under the Establishing a Regulatory Framework for Agricultural Commodities Market in Liberia (RFACM) are among the classes of actions listed in 22CFR216.2(c)(2) and have no foreseeable significant direct or indirect adverse effect on the environment. Therefore, under 22CFR216.2(c)(1), neither an IEE nor an EA will be required for these activities. Instead, a Categorical Exclusion is recommended for the projects/activities described above in Section 1.3 as follows: If environmental issues arise during the implementation of this activity, the PIO will use its environmental guidelines in addressing those issues and will share those standards being used with USAID for review.

TABLE 3: RECOMMENDED DETERMINATION FOR CATEGORICAL EXCLUSION

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### 2.2 CLIMATE RISK MANAGEMENT

#### TABLE 4. PROJECT CLIMATE RISK MANAGEMENT SUMMARY TABLE

<table>
<thead>
<tr>
<th>Defined or Anticipated Project Elements</th>
<th>Climate Risks</th>
<th>Risk Rating</th>
<th>How Risks are Addressed at Project Level</th>
<th>Further Analysis and Actions for Activity Design/ Implementation</th>
<th>Opportunities to Strengthen Climate Resilience</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Purpose/Sub-purpose, Area of Focus, or Activity/ Mechanism, etc.)</td>
<td>List key risks related to the project elements identified through either the strategy- or project-level climate risk assessment.</td>
<td>Low/Moderate/ High</td>
<td>Describe how risks have been addressed at the project level. If a decision has been made to accept the risk, briefly explain why.</td>
<td>Describe CRM measures to be integrated into activity design or implementation, including additional analysis, if applicable.</td>
<td>Describe opportunities to achieve development objectives by integrating climate resilience or mitigation measures.</td>
</tr>
</tbody>
</table>

| N/A | N/A | N/A | N/A | N/A |

#### TABLE 5. ACTIVITY CLIMATE RISK MANAGEMENT SUMMARY TABLE

<table>
<thead>
<tr>
<th>Tasks/Defined or Illustrative Interventions</th>
<th>Climate Risks</th>
<th>Risk Rating</th>
<th>How Risks are Addressed</th>
<th>Opportunities to Strengthen Climate Resilience</th>
</tr>
</thead>
<tbody>
<tr>
<td>The activity involves preparations for the assessment, field data collection, data analysis, and submission of reports to USAID</td>
<td>Changing weather conditions could impact road safety, such as through mud slides caused by increased rainfall.</td>
<td>Low</td>
<td>The implementing partner (IP) is planning to complete field data collection after the rainy season. The IP is also planning to start field work in counties with good roads, thus avoiding these challenging roads during rainy season.</td>
<td>Describe opportunities to achieve multiple development objectives by integrating climate resilience or mitigation measures.</td>
</tr>
</tbody>
</table>

The IP is planning to complete field data collection after the rainy season. The IP is also planning to start field work in counties with good roads, thus avoiding these challenging roads during rainy season.
3.0 LIMITATIONS OF THE CATEGORICAL EXCLUSION

The categorical exclusions recommended in this document apply only to projects/activities and sub-activities described herein.

Other projects/activities that may arise must be subject to an environmental analysis and the appropriate documentation prepared and approved, whether it be a new Request for Categorical Exclusion, an amendment, or other type of 22CFR216 document.

It is confirmed that the projects/activities described herein do not involve actions normally having a significant effect on the environment, including those described in 22CFR216.2(d).

3.1 MANDATORY INCLUSION OF ENVIRONMENTAL COMPLIANCE REQUIREMENTS IN SOLICITATIONS, AWARDS, BUDGETS, AND WORK PLANS

USAID will ensure the environmental compliance requirements are incorporated into solicitations, awards, budgets, and work plans, including relevant limitations of Section 3 above. In addition, climate risk management requirements will also be incorporated.

3.2 GENERAL IMPLEMENTATION & MONITORING REQUIREMENTS (IF APPLICABLE)

USAID will ensure that the following requirements are met:

- Provide briefings for Implementing Partner (IP) on environmental compliance responsibilities
- Ensure integration of compliance responsibilities in prime and sub-awards and grant agreements;
- Ensure compliance with applicable partner country requirements
- Annual review of project activities to ensure that scope is still covered by Categorical Exclusion

ATTACHMENTS:

- Establishing A Regulatory Framework for Agricultural Commodities Market (RFACM) In Liberia - Statement of Work
- Establishing A Regulatory Framework for Agricultural Commodities Market (RFACM) In Liberia - Budget