# Initial Environmental Examination

## Project/Activity Data

<table>
<thead>
<tr>
<th><strong>Project/Activity Name:</strong></th>
<th>Quality Learning Outcomes for Youth</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Geographic Location(s) (Country/Region):</strong></td>
<td>South Sudan</td>
</tr>
<tr>
<td><strong>Amendment (Yes/No), if Yes indicate # (1, 2,...):</strong></td>
<td>No</td>
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<tr>
<td><strong>Implementation Start/End Date (FY or M/D/Y):</strong></td>
<td>10/01/2020 – 09/29-2025</td>
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<tr>
<td><strong>If Amended, specify New End Date:</strong></td>
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</tr>
<tr>
<td><strong>Solicitation/Contract/Award Number(s):</strong></td>
<td>TBD</td>
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<tr>
<td><strong>Implementing Partner(s):</strong></td>
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## Organizational/Administrative Data

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<tr>
<th><strong>Implementing Operating Unit(s):</strong></th>
<th>USAID/South Sudan</th>
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<tbody>
<tr>
<td><strong>(e.g. Mission or Bureau or Office)</strong></td>
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<tr>
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<tr>
<td><strong>Lead BEO Bureau:</strong></td>
<td>AFR</td>
</tr>
<tr>
<td><strong>Funding Account(s) (if available):</strong></td>
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</tr>
<tr>
<td><strong>Original Funding Amount:</strong></td>
<td>$38M</td>
</tr>
<tr>
<td><strong>If Amended, specify funding amount:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>If Amended, specify new funding total:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Prepared by:</strong></td>
<td>Anyieth Ayuen</td>
</tr>
<tr>
<td><strong>Date Prepared:</strong></td>
<td>03/12/2020</td>
</tr>
</tbody>
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## Environmental Compliance Review Data

<table>
<thead>
<tr>
<th><strong>Analysis Type:</strong></th>
<th>☒Environmental Examination</th>
<th>☐Deferral</th>
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<tr>
<td><strong>Environmental Determination(s):</strong></td>
<td>☐Categorical Exclusion(s)</td>
<td>☒Negative</td>
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<tr>
<td><strong>IEE Expiration Date (if applicable):</strong></td>
<td>03/30/2026</td>
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<tr>
<td><strong>Additional Analyses/Reporting Required:</strong></td>
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</tr>
<tr>
<td><strong>Climate Risks Addressed (3):</strong></td>
<td>Low 1 Moderate 2 High 0</td>
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</table>
ACTIVITY SUMMARY

According to the latest study on out-of-school children commissioned by UNESCO, South Sudan has the largest proportion of out-of-school children at 70 percent and the lowest adult literacy rate (27 percent). The large 10-15-year-old cohort of out of school youth will soon be seeking work and starting families and it is urgent that modalities to provide functional literacy and numeracy are found. However, even for those lucky enough to be in schools they are barely making any significant gains, especially on reading comprehension. Therefore, this activity will address how to provide functional literacy and numeracy to this age group in a practical timeframe. USAID is interested in developing a successful model for this group that can be further scaled up to address the needs of this large and socially important group. The activity would use an Accelerated Learning Program (ALP) approach which shortens the official eight years of primary school curriculum content into four years. Interventions would include establishing ALP centers by renting/negotiating with existing providers to use morning and afternoon shifts to accommodate the ALP learners; train teachers; develop/provide teaching and learning materials; and conduct community outreach.

No construction of new infrastructure, and/or modification to infrastructure, is authorized under this program.

ENVIRONMENTAL DETERMINATIONS

Upon approval of this document, the determinations become affirmed, per Agency regulations (22 CFR 216).

TABLE 1: ENVIRONMENTAL DETERMINATIONS

<table>
<thead>
<tr>
<th>Phases</th>
<th>Categorical Exclusion Citation</th>
<th>Negative Determination</th>
<th>Positive Determination</th>
<th>Deferral(^2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase I: identify program locations, recruit teachers and students, obtain (e.g., rent) learning spaces, and develop curriculum (6-12 months).</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Phase II: Implement the accelerated learning program with three cohorts of 2, 3, and 4 years. (48 months).</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Phase III: Monitor post-course graduation outcomes; prepare materials for replication of model. (6-30 months).</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

\(^1\) Positive Determinations require preparation of a Scoping Statement and Environmental Assessment.

\(^2\) Deferrals must be cleared through an Amendment to this IEE prior to implementation of any deferred activities.
CLIMATE RISK MANAGEMENT

The contractor will address the risks identified in section 4.2 below by selecting sites that are less prone to seasonal flooding and those sites that have the capacity to handle waste management responsibilities.

BEO SPECIFIED CONDITIONS OF APPROVAL

**Reporting Conditions:** As is becoming standard throughout the region, the AFR BEO requests that the activity managers/AORs/CORs provide access to the Regional Environmental Advisor (REA) and to the AFR BEO Team to review (not approve) the Environmental Mitigation and Monitoring Plans/Reports (EMMPs/EMMRs) that will be written to implement the findings of this IEE. These should be uploaded into the appropriate sub-folder(s) of this Google Drive folder: https://drive.google.com/drive/folders/1q7HGMzgopJ-MuKxkJ4GSPp9R7Qzv-5?usp=sharing. This will facilitate access by all parties who need these documents, including the Mission Environmental Officer and the AOR/COR. This will allow the REA and the BEO Team to spot-check and review these documents to confirm that the mitigations seem appropriate and are cognizant of the specific design of the activities.

The negative determinations recommended in this IEE are contingent on full implementation of specified conditions and a set of general monitoring and implementation requirements specified in this “BEO Conditions” section as well as Section 5 of the IEE. Some specific conditions to highlight include:

1. New activities and those revised to incorporate a change in scope or nature will require an IEE amendment to identify and address potential environmental impacts. This condition is mentioned again in Section 7 of this IEE.
2. As there are WASH provisions covered under this IEE, the AFR BEO requires that a water quality assurance plan (WQAP) is prepared according to the WQAP Template (https://www.usaid.gov/environmental-procedures/environmental-compliance-esdm-program-cycle/special-compliance-topics/water):
   a. Complete a WQAP for WASH-related activities under this IEE, and request and receive AFR BEO review and approval of WQAP.
   b. Clearly link the WQAP to this IEE
   c. The review results should be written and on record in the Signing Statement of the WQAP.

IMPLEMENTATION

In accordance with 22 CFR 216 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 Sections 3, 4, and 5 of the IEE and any BEO Specified Conditions of Approval.
USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

PROJECT ACTIVITY NAME: Quality Learning Outcomes for Youth

Bureau Tracking ID:

Approval: Patrick Diskin, A/Mission Director, USAID/South Sudan

Clearance: Anyieth Ayuen, Activity Manager

Clearance: Richard Nyarsuk, Mission Environmental Officer

Clearance: Ryan Walther, Program Officer

Clearance: Cleared via Email

David Kinyua, Regional Environmental Advisor

Clearance: Cleared via Email

Alex Apotsos, Acting AFR Climate Integration Lead

Clearance: Cleared via Email

Bert Ubamadu, Regional Legal Officer

Clearance: Cleared via Email

Jeremiah Carew, A/Deputy Mission Director

Concurrence: Brian Hirsh, Bureau Environmental Officer

DISTRIBUTION:

Date: 3/17/20

Date: 03/16/2020

Date: 03/16/2020

Date: 03/16/2020

Date: 03/16/2020

Date: 3/17/20

Date: 3/17/2020
Hi Jeremiah,

Find attached my clearance,

David

[Quoted text hidden]

South Sudan_Quality Learning Outcomes for Youth_IIE_03-16-2020.PDF
263K
## USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

**PROJECT/ACTIVITY NAME:** Quality Learning Outcomes for Youth

**Bureau Tracking ID:**

<table>
<thead>
<tr>
<th>Approval:</th>
<th>Date</th>
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<tbody>
<tr>
<td>Patrick Diskin, A/Mission Director, USAID/South Sudan</td>
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</tbody>
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<tr>
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<th>Date</th>
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<tbody>
<tr>
<td>Anyieth Ayuen, Activity Manager</td>
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</table>

<table>
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<tr>
<th>Clearance:</th>
<th>Date</th>
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<tbody>
<tr>
<td>Richard Nyarsuk, Mission Environmental Officer</td>
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<table>
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<tr>
<th>Clearance:</th>
<th>Date</th>
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<tbody>
<tr>
<td>Ryan Walther, Program Officer</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Clearance:</th>
<th>Date</th>
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</thead>
<tbody>
<tr>
<td>David Kinyua, Regional Environmental Advisor</td>
<td>08/15/2020</td>
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<table>
<thead>
<tr>
<th>Clearance:</th>
<th>Date</th>
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<tbody>
<tr>
<td>Bert Ubamadu, Regional Legal Officer</td>
<td></td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Clearance:</th>
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</thead>
<tbody>
<tr>
<td>Jeremiah Carew, A/Deputy Mission Director</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Clearance:</th>
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<tbody>
<tr>
<td>Colin Quinn, AFR Climate Integration Lead</td>
<td></td>
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<table>
<thead>
<tr>
<th>Concurrence:</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brian Hirsh, Bureau Environmental Officer</td>
<td></td>
</tr>
</tbody>
</table>

**DISTRIBUTION:**
Anyieth Ayuen <aayuen@usaid.gov>

QLOSSY IEE revised and ready for clearances

Alex Apotsos <aapotsos@usaid.gov>  
To: Anyieth Ayuen <aayuen@usaid.gov>, Colin Quinn <cquinn@usaid.gov>  
Cc: David Kinyua <dkinyua@usaid.gov>, Jeremiah Carew <jcarew@usaid.gov>, Richard Nyarsuk <rnyarsuk@usaid.gov>

Anyieth,

I clear in the place of Colin provided you consider the very minor comments I put into the document.

Cheers

Alex

Alex Apotsos, PhD  
Climate Change Advisor  
US Agency for International Development  
Bureau for Africa  
aapotsos@usaid.gov

[Attachment: IEE for Quality Learning Outcomes for Youth March 2020 AAA.docx]
Jeremiah,

RLO clears.

Regards
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Senior Resident Legal Officer
USAID/Ethiopia
Tel: +251111306538
Cell: +251975382777
Email: bubamadu@usaid.gov

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INITIAL ENVIRONMENTAL EXAMINATION

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1.0 ACTIVITY DESCRIPTION

1.1 PURPOSE OF THE IEE

The purpose of this document, in accordance with Title 22, Code of Federal Regulations, Part 216 (22 CFR 216), is to provide a preliminary review of the reasonably foreseeable effects on the environment of the USAID intervention described herein and recommend determinations and, as appropriate, conditions, for these activities. Upon approval, these determinations become affirmed, and specified conditions become mandatory obligations of implementation. This IEE also documents the results of the Climate Risk Management process in accordance with USAID policy (specifically, ADS 201mal).

This IEE is a critical element of USAID's mandatory environmental review and compliance process meant to achieve environmentally sound design and implementation. Potential environmental impacts should be addressed through formal environmental mitigation and monitoring plans (EMMPs) and/or Environmental Assessments (EAs), if needed.

1.2 ACTIVITY OVERVIEW

Quality Learning Outcomes for Youth is a new activity that contributes to achievement of the Revised Operational Framework Transitional Objective 1, “Promote recovery with resilience” and IR 1.2, “Increased utilization of educational services that elevate learning and well-being.” It was approved via an amendment to the PAD entitled, “Integrated Essential Services Project” on May 20, 2019. It is anticipated to be awarded o/a September 30, 2020.

1.3 ACTIVITY AND SUB-ACTIVITY DESCRIPTIONS

According to the latest study on out-of-school children commissioned by UNESCO, South Sudan has the largest proportion of out-of-school children at 70 percent and the lowest adult literacy rate (27 percent). The large 10-15 year old cohort of out of school youth will soon be seeking work and starting families and it is urgent that modalities to provide functional literacy and numeracy are found. However, even for those lucky enough to be in schools they are barely making any significant gains, especially on reading comprehension. Therefore, this activity will address how to provide functional literacy and numeracy to this age group in a practical timeframe. USAID is interested in developing a successful model for this group that can be further scaled up to address the needs of this large and socially important group.

The activity would use an Accelerated Learning Program (ALP) approach which shortens the official eight years of primary school curriculum content into four years. Interventions would include: establish ALP centers by renting/negotiating with existing education providers including use of a morning and afternoon shifts to accommodate the ALP learners; train teachers; develop/provide teaching and learning materials; and conduct community outreach.
### TABLE 2: DEFINED ACTIVITY PHASES

<table>
<thead>
<tr>
<th>Activity — Quality Learning Outcomes for Youth</th>
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<tbody>
<tr>
<td>Phase I: Identify program locations, recruit teachers and students, obtain (e.g., rent) learning spaces, and develop curriculum (6-12 months)</td>
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<tr>
<td>Phase II: Implement the accelerated learning program with three cohorts of 2, 3, and 4 years. (48 months)</td>
</tr>
<tr>
<td>Phase III: Monitor post-course graduation outcomes; prepare materials for replication of model. (6-30 months)</td>
</tr>
</tbody>
</table>

Will this project/activity involve construction[^3] as defined by ADS 201 and 303? Yes ☐ No ☒

[^3]: Construction, as defined by ADS 201 and 303, includes: construction, alteration, or repair (including dredging and excavation) of buildings, structures, or other real property and includes, without limitation, improvements, renovation, alteration and refurbishment. The term includes, without limitation, roads, power plants, buildings, bridges, water treatment facilities, and vertical structures. In the box below, describe any construction planned for this project/activity. Refer to [ADS 201maw](#) for required Construction Risk Management procedures.
2.0 BASELINE ENVIRONMENTAL INFORMATION

2.1 LOCATIONS AFFECTED AND ENVIRONMENTAL CONTEXT (ENVIRONMENT, PHYSICAL, CLIMATE, SOCIAL, THREATENED AND ENDANGERED SPECIES)

The program locations are likely to be spread in the whole country.

**Geography.** South Sudan covers an area of about 640,000 square kilometers and includes stretches of tropical and equatorial forests, wetlands (including the Sudd swamps), savannah and mountains. Vegetation in the South is characterized by Sudanian woodlands, with lowland forest patches along the border with the Democratic Republic of the Congo (DRC) and the Imatong Mountains. Around the White Nile are very extensive swamps and floodplains. The most important montane forests in South Sudan are in the Imatong Mountains in the extreme south, including Didinga and Dongotona Mountains. The high agriculture potential Greenbelt is in the southern states of Western Equatoria, Central Equatoria, and Eastern Equatoria. South Sudan is entirely within the Nile River basin and shares borders with five countries (Ethiopia, Kenya, Uganda, Central African Republic, and Democratic Republic of the Congo).

**Climate.** According to the 2006 Livelihoods Profile, South Sudan’s climate is predominantly sub-humid. Rainfall is favorable, with Western Equatoria and highland parts of Eastern Equatoria receiving 1,200 to 2,200 mm of rainfall annually. The lowland areas of Eastern Equatoria, Jonglei, Upper Nile, and Bahr el Ghazal receive between 700 and 1,300 mm of rainfall annually. The south-eastern tip of Eastern Equatoria receives the least rainfall, about 200 mm annually.

Temperatures in South Sudan are typically above 25°C and can rise above 35°C, particularly during the dry season, which lasts from January to April. The hot, dry conditions trigger seasonal human and livestock migration to more permanent water sources, which serve as dry season grazing pasture, and for some ethnic groups, such as the Dinka, they also serve as fishing grounds.

**Agriculture and Land Use.** Cultivated area in South Sudan has historically ranged between a minimum of one percent and a maximum of two percent of the total area (i.e. 640,000 – 1,300,000 ha). According to FAO-WFP (Crop and Food Supply Assessment Missions-CFSAM 1996-2007), about 950,000 ha are currently cultivated under cereals (sorghum being the main cereal, followed by millet and maize), yielding less than 1 ton per hectare. Agricultural potential is high with about 90 percent of its total area considered suitable for agriculture, 50 percent of which is prime agricultural land. Soil and climate conditions allow for a wide variety of food and cash crops.
Farming in the target areas (i.e., Jonglei and the Lakes State) is predominantly smallholder cultivation using traditional techniques of production, such as slash and burn associated with shifting cultivation. Soils in the project area are mostly fertile. Agricultural implements commonly used are hand hoes, axes and machetes.

**Water resources and irrigation.** The Nile water basin contributes most of Sudan’s available surface water, transporting on average over 93 billion cubic meters of water per year through the country. The Nile River traverses through the length of Sudan, entering through its borders with Uganda (White Nile) and Ethiopia (Blue Nile). According to the United Nations’ Food and Agriculture Organization, Sudan’s total renewable water resources are estimated at 149 km³ yr⁻¹, of which 30 km³ yr⁻¹ are produced internally, with 119 km³ yr⁻¹ coming from the Nile and its tributaries. Jonglei is well-endowed with water resources across most of the state. That said, poor water management means that even areas that are flooded for 6-8 months of the year (e.g. Nile-Sobat and Eastern Floodplains Livelihood zones) still suffer from recurrent seasonal droughts.

**Ecological zones.** There are five ecological zones: savannah, flood, montane forest, semi-desert, and lowland forest. The Savannah Region is further divided into low rainfall woodland savannah zone and high rainfall woodland savannah zone. Common fauna of the woodland savannah include a variety of large mammals, birds, reptiles, amphibians, and invertebrates. The Flood Region includes the Sudd and Toic, which are areas that are subject to seasonal flooding when the soil retains sufficient moisture throughout the dry season to support grasses. They are important for dry season grazing by livestock and wildlife. The Sudd is one of the largest floodplains in Africa and one of the biggest tropical wetlands in the world. The Sudd has been designated as a Ramsar site, which means it is a wetland of global significance and contains critical habitat for endemics, endangered species of flora and fauna, and other globally important biodiversity. The Sudd is an important breeding area for Nile ecosystem fish species and is the largest potential source of freshwater fish in South Sudan. There are over 100 species of fish in the Sudd alone. The Sudd’s aquatic biodiversity is threatened by the infestation of invasive non-native plant species, such as the water hyacinth.

Montane forests of South Sudan are part of the Eastern Afromontane ecosystem, which is one of Africa’s biodiversity hotspots. They are found in the following mountains: Imatong, Dongotona, Acholis, Didinga, and Jebel Gumbiri. Historically, the Imatong Mountains had a wide variety of birds, including a number of species that are not found elsewhere in Sudan.

While these forests are rich with endemic plants, animals, and birdlife, this ecosystem is also highly deforested due to agricultural activities. The wooded highlands of the Nuba Mountains historically contained large amounts of wildlife, but the Sudanese Civil War led to a substantial decline of many animal populations.

Semi-desert regions are in the extreme southeast, in and around the Ilemi Triangle where the average annual rainfall is 300 to 500 mm. Vegetation mainly consists of patches of short grasslands with acacia bush land. Semi-desert zone is an extension of the northeastern Kenya
semi-arid zone and shares many of the fauna and flora from that region. No areas in this ecoregion have been designated for protection.

The lowland forest zone is limited to a few scattered small areas in the southwest and the foothills of the Imatong Mountains. The threatened eastern chimpanzee and elephants are among the wildlife found in this zone. Threats include an active illegal chimpanzee trade in this area.

Soils. Sandy soils are found in the northern and west central areas, clay soils in the central region, and rusty-red laterite soils are found in the south. The clay soils are the agriculturally most important soil and are also known as cracking clay soils as they crack during the dry season. The majority of soils found in South Sudan are moderately fertile but need appropriate cultivation to maintain fertility appropriate for crop production.

Biodiversity. South Sudan has a variety of habitats that are rich in plant life. These include the montane forests, woodlands, and wooded grasslands. More than 350 species of plants have been recorded in the Sudd region alone, common among them being sedges and grasses found in other African wetlands.

South Sudan has several endemic species, such as the Nile lechwe, white-eared kob, and spotted ground thrush, which can be found in the Imatong Mountains and Loti forest. Close to 800 species of birds have been recorded, with more than 470 species in the Sudd region alone. It also supports over 20,000 water birds throughout the year and is a wintering ground for migratory birds from Europe. Important natural phenomena that occur in South Sudan include one of the largest antelope migrations in the world.

In general, wildlife appears to be thriving, particularly in areas that were inaccessible during the war (e.g., the Boma/Jonglei landscape), however there have been reports of significant drops and local extinctions of some species. It is difficult to determine the status of wildlife populations as much of the data is either outdated or unavailable. Previous wildlife surveys from the 1980s and 2007 indicate a decline in almost all of the species surveyed.

Direct threats include habitat degradation, such as deforestation, and illegal poaching. Additionally, there is limited infrastructure for managing natural resources.

2.2 APPLICABLE AND APPROPRIATE PARTNER COUNTRY AND OTHER INTERNATIONAL STANDARDS (E.G. WHO), ENVIRONMENTAL AND SOCIAL LAWS, POLICIES, AND REGULATIONS

“Standards for WASH in school/learning centres in South Sudan” from South Sudan School Construction Standards and Guidelines (Government of South Sudan, Ministry of General Education and Instruction, 2016) that address WASH facilities, water, potable water, water supply systems and sanitation facilities. Details in the annex.

2.3 COUNTRY/MINISTRY/MUNICIPALITY ENVIRONMENTAL CAPACITY ANALYSIS (AS APPROPRIATE)

The host government is heavily decentralized, with states and counties as key jurisdictions, and does not have the capacity nor the resources to enforce regulations. Regulations are developed at the center while implementation happens at the local levels. To take an example relevant for
the education sector, the top issue facing education donors in South Sudan is that Government teachers are not paid timely. For instance, in late 2019, teachers went five to six months before receiving a partial back payment of salary in November 2019. As of March 2020, teachers have gone at least three months with no salary. The inability to pay teachers and administrative staff brings the whole education sector to a halt, as teachers often do not attend and, when they do, are not motivated. This issue affects not only teachers, but the entire civil service.

In this activity, schools and learning centers will therefore rely on private providers and donors for best practices on proper implementation of standards and guidelines in management and mitigation of the adverse effects of the operations on their environment.
### 3.0 ANALYSIS OF POTENTIAL ENVIRONMENTAL RISK

**TABLE 3. POTENTIAL IMPACTS**

<table>
<thead>
<tr>
<th>Phases</th>
<th>Potential environmental and social impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase I: identify program locations, recruit teachers and students,</td>
<td>In the sub-activity, “identify program locations”, there are a number of potential environmental/social conditions in existing sites that could cause impacts, if such sites were chosen for implementation. Those conditions are:</td>
</tr>
<tr>
<td>obtain (e.g., rent) learning spaces, and develop curriculum (6-12 months)</td>
<td>• Improper siting of water well close to sources of contamination, such as latrines;</td>
</tr>
<tr>
<td></td>
<td>• Improper siting of learning centers, for example, if the learning center is in a flood plain, wetlands or drought prone area;</td>
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<tr>
<td></td>
<td>• The pit latrines serving the school/learning center are located too close to the classrooms</td>
</tr>
<tr>
<td></td>
<td>• The school/learning center pit latrines are not sloping away from the classes therefore bringing bad odour to the classes</td>
</tr>
<tr>
<td>Phase II: Implement the accelerated learning program with three cohorts of 2, 3, and 4 years. (48 months)</td>
<td>In this Phase, 100-200 learners will be brought together per site/location and there are a number of potential environmental and social impacts:</td>
</tr>
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<td>• It is likely that waste will be generated by the learners during their time at the site;</td>
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<td>• Biological contamination of ground and surface waters from pit latrines, septic, wastewater systems and waste pits that are improperly designed or poorly sited, maintained and managed - that could negatively impact the environment and human health;</td>
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<td>• With the influx of additional people into the school ground and with the associated waste generated, the common practice of open burning of waste can lead to air pollution;</td>
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<td>• The growth in school population can lead to increased greenhouse gas emissions from decomposing waste;</td>
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<td>• Induced/indirect effect on settlement due to the creation of a learning centers that may attract population - this additional settlements as a result of the establishment of learning centers can lead to deforestation or degradation of the land due to the additional population settlements.</td>
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<tr>
<td>Phase III: Monitor post-course graduation outcomes; prepare materials for replication of model. (6-30 months)</td>
<td>Phase II is mostly assessing and evaluating the model for lessons learned and making recommendations for adoption therefore there are no potential environmental and social impacts</td>
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</tbody>
</table>
4.0 ENVIRONMENTAL DETERMINATIONS

4.1 RECOMMENDED ENVIRONMENTAL DETERMINATIONS

The following table summarizes the recommended determinations based on the environmental analysis conducted. Upon approval, these determinations become affirmed, per 22 CFR 216. Specified conditions, detailed in Section 5, become mandatory obligations of implementation, per ADS 204.

TABLE 4: ENVIRONMENTAL DETERMINATIONS

<table>
<thead>
<tr>
<th>Phases</th>
<th>Categorical Exclusion Citation (if applicable)</th>
<th>Negative Determination</th>
<th>Positive Determination</th>
<th>Deferral 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase I: Identify program locations, recruit teachers and students, obtain (e.g., rent) learning spaces, and develop curriculum (6-12 months)</td>
<td>☒</td>
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<tr>
<td>Phase II: Implement the accelerated learning program with three cohorts of 2, 3, and 4 years. (48 months)</td>
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<tr>
<td>Phase III: Monitor post-course graduation outcomes; prepare materials for replication of model. (6-30 months)</td>
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</tbody>
</table>

4 Positive Determinations require preparation of a Scoping Statement and Environmental Assessment.

5 Deferrals must be cleared through an Amendment to this IEE prior to implementation of any deferred activities.

4.2 CLIMATE RISK MANAGEMENT

This section summarizes the methodology used and findings of the CRM Screening, in accordance with ADS 201mal. The project design team, in consultation with the CIL, considered the potential effect of climate risks/stressors on the sustainability of the project (changing precipitation patterns, rising temperature, floods, droughts, fires, landslides, etc.) in addition to the impact of project activities on the climate (increased greenhouse gas emissions, land use changes, etc.). See Annex 1 for the complete CRM table.

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4 Positive Determinations require preparation of a Scoping Statement and Environmental Assessment.

5 Deferrals must be cleared through an Amendment to this IEE prior to implementation of any deferred activities.
5.0 CONDITIONS AND MITIGATION MEASURES

5.1 CONDITIONS

The environmental determinations in this IEE are contingent upon full implementation of the following general implementation and monitoring requirements, as well as ADS 204 and other relevant requirements.

5.1.1 During Pre-Award:

5.1.1.1 Pre-Award Briefings: As feasible, the design team and/or the cognizant environmental officer(s) (e.g., MEO, REA, BEO) will provide a pre-award briefing for potential offerors on environmental compliance expectations/resibilities at bidders’ conferences.

5.1.1.2 Solicitations: The design team, in coordination with the CO, will ensure solicitations include environmental compliance requirements and evaluation criteria. CO will ensure technical and cost proposal requirements include approach, staffing, and budget sufficient for complying with the terms of this IEE.

5.1.1.3 Awards: The COR, in coordination with the CO, will ensure all awards and sub-awards, include environmental compliance requirements.

5.1.2 During Post-Award:

5.1.2.1 Post-Award Briefings: The COR and/or the cognizant environmental officer(s) (e.g., MEO, REA, BEO) will provide post-award briefings for the IP on environmental compliance responsibilities.

5.1.2.2 Workplans and Budgeting: The COR will ensure the IP integrates environmental compliance requirements in work plans and budgets to comply with requirements, including EMMP implementation and monitoring.

5.1.2.3 Staffing: The COR, in coordination with the IP, will ensure all awards have staffing capacity to implement environmental compliance requirements.

5.1.2.4 Records Management: The COR will maintain environmental compliance documents in the official project/activity file and upload records to the designated USAID environmental compliance database system.

5.1.2.5 Host Country Environmental Compliance: The COR will ensure the IP complies with applicable and appropriate host country environmental requirements unless otherwise directed in writing by USAID. However, in the case of a conflict between the host country and USAID requirements, the more stringent shall govern.

5.1.2.6 Work Plan Review: The COR will ensure the IP verifies, at least annually or when activities are added or modified, that activities remain with the scope of the IEE. Activities outside of the scope of the IEE cannot be implemented until the IEE is amended.
5.1.2.8 IEE Amendment: If new activities are introduced or other changes to the scope of this IEE occur, an IEE Amendment will be required.

5.1.2.14 USAID Monitoring Oversight: The COR or designee, with the support of the cognizant environmental officer(s) (e.g., MEO, REA, BEO), will ensure monitoring of compliance with established requirements (e.g., by desktop reviews, site visits, etc.).

5.1.2.16 Environmental Compliance Mitigation and Monitoring Plan: The COR will ensure the IP develops, obtains approval for, and implements Environmental Mitigation and Monitoring Plans (EMMPs) that are responsive to the stipulated environmental compliance requirements.

5.1.2.17 Environmental Compliance Reporting: The COR will ensure the IP includes environmental compliance in regular project/activity reports, using indicators as appropriate; develops and submits the Environmental Mitigation and Monitoring Reports (EMMRs); and completes and submits a Record of Compliance (RoC) describing their implementation of EMMP requirements in conjunction with the final EMMR or at the close of sub activities (as applicable). And where required by Bureaus or Missions, ensure the IP prepares a closeout plan consistent with contract documentation for COR review and approval that outlines responsibilities for end-of-project operation, the transition of other operational responsibilities, and final EMMR with lessons learned.

5.1.2.18 Corrective Action: When noncompliance or unforeseen impacts are identified, IPs notify the COR, place a hold on activities, take corrective action, and report on the effectiveness of corrective actions. The COR initiates the corrective action process and ensures the IP completes and documents their activities. Where required by Bureaus or Missions, ensure Record of Compliance is completed.

5.2 AGENCY CONDITIONS

5.2.1 Sub-award Screening: The COR will ensure the IP uses an adequate environmental screening tool to screen any sub-award applications and to aid in the development of EMMPs.

5.2.2 Programmatic IEEs (PIEE): PIEEs stipulate requirements for additional environmental examination of new or country specific projects/activities. The COR of any project/activity being implemented under a PIEE will ensure appropriate reviews are conducted, typically through a Supplemental IEE, and approved by the cognizant BEO.

5.2.3 Supplemental IEEs (SIEEs): An SIEE will be prepared for any new project/activity being planned which fall under a PIEE. The SIEE will provide more thorough analysis of the planned activities, additional geographic context and baseline conditions as well as specific mitigation and monitoring requirements.

5.2.4 Other Supplemental Analyses: The COR will ensure supplemental environmental analyses that are called for in the IEE are completed and documented.

5.2.5 Resolution of Deferrals: If a deferral of the environmental threshold determination was issued, the COR will ensure that the appropriate 22CFR216 environmental
analysis and documentation is completed and approved by the BEO before the subject activities are implemented.

5.2.6 Positive Determination: If a Positive Determination threshold determination was made, the COR will ensure a Scoping Statement, and if required an Environmental Assessment (EA), is completed and approved by the BEO before the subject activities are implemented.

5.2.7 Compliance with human subject research requirements: The AM, COR shall assure that the IP and sub-awardees, -grantees, and -contractors demonstrate completion of all requirements for ethics review and adequate medical monitoring of human subjects who participate in research trials carried out through this IEE and ensure appropriate records are maintained. All documentation demonstrating completion of required review and approval of human subject trials must be in place prior to initiating any trials and cover the period of performance of the trial as described in the research protocol.

5.3 MITIGATION MEASURES

The mitigation measures presented in this section constitute the minimum required based on available information at the time of this IEE and the environmental analysis in Section 4. These measures shall provide general direction for completing the project/activity Environmental Mitigation and Monitoring Plan (EMMP) and/or the EA and PERSUAP, if required.

TABLE 5. SUMMARY OF MITIGATION MEASURES BY PHASE

<table>
<thead>
<tr>
<th>Phases</th>
<th>Mitigation Measure(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase I: Identify program locations, recruit teachers and students, obtain (e.g., rent) learning spaces, and develop curriculum (6-12 months)</td>
<td>The factors to be used in selection of program locations (at a state/county level) are as follows: The Contractor should identify program locations that present opportunities for layering with other development and humanitarian activities, as part of USAID’s overall strategic approach to comprehensively address the resilience needs of targeted vulnerable groups. To this end, the Contractor should propose locations based on one or more of several factors: security/access; political implications (e.g., balancing areas of governmental control with SPLM-IO areas); opportunities to complement other donor-funded assistance activities including, where appropriate, locations where the Partnership for Recovery and Resilience (PIRR) operates; needs for an AL program; and demonstration of community engagement and commitment. With regard to selection of specific (Payam/Boma/facility) program locations: The Contractor should consider estimated susceptibility to natural disasters as a factor in the program location considerations. Locations/facilities identified for implementation should be in line with the minimum standards for schools on WASH facilities (see relevant GOSS guidelines in Annex 6).</td>
</tr>
</tbody>
</table>

6 Payam is level below county, known as sub-county in Uganda and Kenya; Boma is the lowest level administrative sub-division, below payams.
<table>
<thead>
<tr>
<th>Phases</th>
<th>Mitigation Measure(s)</th>
</tr>
</thead>
</table>
| Phase II: Implement the accelerated learning program with three cohorts of 2, 3, and 4 years. (48 months) | Follow minimum standards for schools on WASH facilities (see relevant GOSS guidelines in Annex 3) and implement activity only in areas where there is an existing waste management plan and capacity to include recycling of the waste generated by bringing many learners into one location. Prepare a water quality assurance plan (WQAP) according to the WQAP Template (https://www.usaid.gov/environmental-procedures/environmental-compliance-esdm-program-cycle/special-compliance-topics/water):  
  - Complete a WQAP for WASH-related activities under this IEE, and request and receive AFR BEO review and approval of WQAP.  
  - Clearly link the WQAP to this IEE  
  - The review results should be written and on record in the Signing Statement of the WQAP.  
  Provide context appropriate training on waste management and disposal. |
| Phase III: Monitor post-course graduation outcomes; prepare materials for replication of model. (6-30 months) | No associated conditions                                                                                                                                                                                                 |
6.0 LIMITATIONS OF THIS INITIAL ENVIRONMENTAL EXAMINATION

The determinations recommended in this document apply only to projects/activities and sub-activities described herein. Other projects/activities that may arise must be documented in either a separate IEE, an IEE amendment if the activities are within the same project/activity, or other type of environmental compliance document and shall be subject to an environmental analysis within the appropriate documents listed above.

Other than projects/activities determined to have a Positive Threshold Determination, 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 22 CFR 216.2(d).

In addition, other than projects/activities determined to have a Positive Threshold Determination and/or a pesticide management plan (PERSUAP), it is confirmed that the projects/activities described herein do not involve any actions listed below. Any of the following actions would require additional environmental analyses and environmental determinations:

- Support project preparation, project feasibility studies, or engineering design for activities listed in §216.2(d)(1);
- Affect endangered and threatened species or their critical habitats per §216.5, FAA 118, FAA 119;
- Provide support to extractive industries (e.g. mining and quarrying) per FAA 117;
- Promote timber harvesting per FAA 117 and 118;
- Lead to new construction, reconstruction, rehabilitation, or renovation work per §216.2(b)(1);
- Support agro-processing or industrial enterprises per §216.1(b)(4);
- Provide support for regulatory permitting per §216.1(b)(2);
- Lead to privatization of industrial facilities or infrastructure with heavily polluted property per §216.1(b)(4);
- Research, testing, or use of genetically engineered organisms per §216.1(b)(1), ADS 211;
- Assist the procurement (including payment in kind, donations, guarantees of credit) or use (including handling, transport, fuel for transport, storage, mixing, loading, application, clean-up of spray equipment, and disposal) of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials. Pesticides cover all insecticides, fungicides, rodenticides, etc. covered under the Federal Insecticide, Fungicide, and Rodenticide Act per §216.2(e) and §216.3(b).

7.0 REVISIONS

Per 22 CFR 216.3(a)(9), when ongoing programs are revised to incorporate a change in scope or nature, an IEE amendment will be prepared to identify and address all environmental impacts. Per ADS 204, it is the responsibility of the USAID A/COR to keep the MEO/REA and BEO informed of any new information or changes in the activity or environmental impacts, requiring revision of this environmental analysis and environmental determination.

ATTACHMENTS:

Annex 1: Climate Risk Management Summary Table for Activity (use for Activity level IEE)
<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>Opportunitie s to Strengthen Climate Resilience</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase I: Identify program locations, recruit teachers and students, obtain (e.g., rent) learning spaces, and develop curriculum (6-12 months)</td>
<td>Program locations chosen which are prone to natural disaster (e.g., frequent flooding)</td>
<td>Low</td>
<td>IP will have estimated susceptibility to natural disaster as a factor in their program location matrix</td>
<td></td>
</tr>
<tr>
<td>Phase II: Implement the accelerated learning program with three cohorts of 2, 3, and 4 years. (48 months)</td>
<td>Natural disaster, like late 2019 floods, occurs, which interrupts Accelerated Learning Program implementation</td>
<td>Medium</td>
<td>As an ALP program there is more flexibility in terms of the school year than official government schools; therefore, warn teachers and students of potential need to extend class days if schooling interrupted</td>
<td>Consider opportunities to educate cohorts on climate change and climate risk in addition to curriculum.</td>
</tr>
<tr>
<td>Phase III: Monitor post-course graduation outcomes; prepare materials for replication of model. (6-30 months)</td>
<td>Natural disaster, similar to late 2019 floods, occurs, preventing access to study locations</td>
<td>Medium</td>
<td>All beneficiaries will be required to accept the need to cooperate with follow-up activities and maintain contact info current. This practice will maximize ability to contact as many beneficiaries post-graduation as possible. Look for opportunities for remote feedback (e.g., SMS).</td>
<td></td>
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</tbody>
</table>

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7 List key risks related to the defined/illustrative interventions identified in the screening and additional assessment.

8 Low/Moderate/High

9 Describe how risks have been addressed in activity design and/or additional steps that will be taken in implementation. If you chose to accept the risk, briefly explain why.

10 Describe opportunities to achieve multiple development objectives by integrating climate resilience or mitigation measures.
## ANNEX 2: EMMP TABLE FOR [PROVIDE NAME OF ACTIVITY]

<table>
<thead>
<tr>
<th>Project/Activity/Sub-Activity</th>
<th>Identified Environmental Aspects or Impacts</th>
<th>Mitigation Measure(s)</th>
<th>Monitoring Indicator(s)</th>
<th>Monitoring and Reporting Frequency</th>
<th>Responsible Parties</th>
<th>Field Monitoring/Issues/Resolution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Activity 1:</td>
<td></td>
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<td>Field monitoring needs to be adequately addressed i.e. monitoring dates, observations, issues identified and resolution</td>
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<td>Activity 2:</td>
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<td>Activity 3:</td>
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<td>Activity 4:</td>
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<td><strong>Activity 5:</strong></td>
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<td><strong>Activity 6:</strong></td>
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</table>

*Add rows as needed*
USAID APPROVAL OF EMMP

Approval:

[NAME], Activity Manager/A/COR [required] Date

Clearance:

[NAME], Mission Environmental Officer [as appropriate] Date

Clearance:

[NAME], Regional Environmental Advisor [as appropriate] Date

Concurrence:

[NAME], _________ Bureau Environmental Officer [as appropriate] Date
Wash Facilities: The access to adequate WASH facilities responds to one of the basic Child Friendly School objectives, requiring a “health, clean, secure and learner protective environment”.

WASH in the schools is today a major challenge in South Sudan, specific and practical considerations shall be addressed accordingly in this paragraph.

WASH facilities in a school include:
- Access to safe, drinkable water
- Access to clean water
- Access to sanitation facilities
- Access to washing facilities and possibly to personal hygiene space

Water: Access to a reliable source of clean water within a School parcel is a task yet to be accomplished in South Sudan. Moreover, whereas a substantial percentage of the permanent built schools have access to a borehole, in many of them access to clean water is still a problem. Quality of the borehole, its position, lack of storage facilities are factors that can negatively affect the equal access to water for schools’ pupils. As outlined in the planning section, availability of clean water must be addressed with the highest priority during the site selection phase. Rainwater harvesting systems are encouraged and should be used as a method of obtaining water.

Potable Water: A school must give access to safe drinking water. At least one water point must be installed at each school, and it must be equipped with a hygienic way to drink it.

The guidelines include:
- Water quantity: 1 to 2 liter/day per pupil
- Water quality: odourless colourless and tasteless
- A water quality analysis must be carried out for all school borehole installations
- Testing criteria shall be specified and include turbidity, conductivity and water content limits.
- Mitigation measures such as a water treatment system must be put in place wherever the required limits are not met by the sourced water.
- For cases of arsenic in the borehole water, such a well must be condemned
- Borehole location must be upstream of the latrines and at a minimum distance of 30m (to be confirmed by a geological survey).

Non-Potable (clean) Water: A school must give access to clean water for cleaning and washing. At least 1 washing point with adequate drainage channeling must be available per 100 pupils.

The guidelines include:
- Water quantity: 5 litres/day per pupil
- Water quality: possibly colourless.
- If necessary, decantation and clarification can be achieved in a storage tank prior to use.

**Water Supply Systems:** Clean and drinkable water can be sourced in different ways, provided that the quality of the water and the distance from the classroom area requirements are met.

The guidelines include:
- If a reliable external supply is not guaranteed, a borehole equipped with a manual pump is a must.
- The borehole should be equipped with a solar pump and connected to a storage tank.
- The tank may therefore supply a basic network connected to the main facilities (water taps, sanitation blocks, kitchen, etc.).
- In situations where water availability depends on an external supply (as the city council network or a water fetcher), a water storage system must be available in the school, possibly for the equivalent of 2 days’ use.
- Leakage and pressure testing shall be carried out at the completion of the installation works.
- Water taps and basins shall possibly be built in concrete for durability reasons.
- Adequate water apron and channelling towards a soaking pit shall be put in place in order to limit water stagnation.

**Sanitation Facilities:** Sanitation facilities play a key role in the school operation. First of all for health reasons, since the link between poor sanitation and poor health is evident. Secondary and not least, the lack of adequate sanitation facilities is a major reason why many children, particularly girls, fail to attend school. Sanitation facilities are a must in the Child Friendly Schools approach, they hence have to be considered from the onset of the planning phase.

The role of the child friendly schools is to create learner friendly environments. This is achieved not only through formal classroom education, but also by promoting good practice in daily living and environment. Sanitation is an essential aspect of promoting good practice and schools have a duty to promote its implementation.

Sanitation minimum program

**Girls**
- 40 girls/1 unit, with 1 accessible unit
- 1 hand wash point with tap and soap / 2 units
- 1 personal hygiene compartment

**Boys**
- 50 boys/1 unit, with 1 accessible unit
- 1 hand wash point with tap and soap / 2 units
- 1 urinal (50 cm of wall)

**Staff**
- 25 staff/1 unit, with separate Women and Men units, with 1 accessible unit
- 1 hand wash point with tap and soap / 2 units

Handwashing taps should be conceived in a durable way. Movable handwashing taps (i.e. small plastic tank on a steel stand) can be accepted as a temporary solution. Ideally, the handwashing point should be integrated within the sanitation blocks, and solidly built with a concrete, in-situ cast basin.
Separate facilities: Girls and Boys sanitation facilities must be separate, including their own washing basins and taps. The separation should be effective, with adequate distance, visual, noise and odour separation.

Personal hygiene compartment: A Personal Hygiene compartment where older girls can wash and change during menstruation must be offered. The provision of sanitary towels, hygienic pads and disposal facilities should be made available at schools for older girls. Hygienic and safe disposal practice must be advocated (see incineration for reference and discussion).

Specific requirements for it are:
- Minimum dimensions 1x1.5m.
- Lockable door.
- Equipped with shower drainage and possibly with water.

Sanitation facilities standards: Sanitation facilities shall be designed in a way they can be safe, easily cleaned and maintained in order to remain decent during the years.
- Safe facilities with no unstable floors or full pits
- Smooth, durable and wide surfaces easy-to-clean
- Slopes must be provided for water running off and avoiding stagnant water

The selection and design of the sanitation facilities typology must consider multiple factors such as:
- Specific climatic conditions (i.e. rainy season trends)
- Specific ground conditions.
- Regional cultural considerations.

Other critical elements to be considered are:
- Actual fund availability and maintenance capacity.
- The use of water in the sanitation facilities by Muslim communities.
- Whenever water is expected to be stored inside the latrine tank, the tank must be sealed ("U-shape" pipes, latrine cover, etc.) in order to limit insect breeding inside it.
- Maintenance access, including sludge removal, must be provided (manhole, vehicle accessibility, etc.).
- Toilets used by older girls should be lockable.

Possible technical solutions for the facilities include:
- Ventilated Improved Pit Latrines (VIP)
- Septic tanks
- Barrel latrines

Remember to consider the following:
- Presence of water
- Soaking ground capabilities
- Maintenance issues

Sanitation facilities usage considerations
- Facilities location must be considered during the planning phase, also considering local customs and cultural sensitivities.
- Possibly, every toilet block should be easily supervised from the classrooms or the administration block. It must be accessible from the outside.
• The sanitation facilities must be clear distance away from classrooms to avoid smell. Consider prevailing wind direction when planning.
• Possibly avoid areas with risk of flooding. When a risk persists, design an adequate height for FFL above ground level to avoid water from entering the facilities.
• Remember to consider access for maintenance vehicles.
• Possibly consider smaller squatting tables for younger children.