**Memo to the File: Initial Environmental Examination (IEE)**

<table>
<thead>
<tr>
<th>Development Objective</th>
<th>DO4 (Strengthened Resilience to Natural Hazards)</th>
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</thead>
<tbody>
<tr>
<td>Country and/or Operating Unit</td>
<td>Bangladesh</td>
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<tr>
<td>Originating Office</td>
<td>Economic Growth</td>
</tr>
<tr>
<td>Initial Environmental Examination (IEE)</td>
<td>CGIAR Fund II IEE signed by BFS BEO on July 13, 2017</td>
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<tr>
<td>Activity Name</td>
<td>ECOFISH II</td>
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<tr>
<td>Start/End Date</td>
<td>January 1, 2020 – December 31, 2024¹</td>
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<tr>
<td>Period of Coverage Start/End Date</td>
<td></td>
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<tr>
<td>Funding Amount</td>
<td>$10,000,000</td>
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<tr>
<td>Award Number</td>
<td>BFS-G-11-00002</td>
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**Purpose:**
The purpose of this Memo is to document that the activities under USAID’s ECOFISH II are fully covered by the CGIAR Fund II IEE, which is managed by the Bureau of Food Security, USAID/Washington. ECOFISH II is a field support mechanism managed by the Bureau of Food Security (BFS); BFS’s Bureau Environmental Officer signed the CGIAR Fund II IEE on July 13, 2017; a copy of this IIE is on file.

This Memo to the File documents the relevant environmental compliance issues for ECOFISH II:

1. The incorporation of this activity under BFS’s CGIAR Fund II IEE;
2. The funding of this activity is covered through the funding period for the IEE;
3. A future BFS IEE will cover the remainder of the funding period of this activity²;
4. The Threshold Determinations and Mitigation Conditions of CGIAR Fund II IEE govern this activity;
5. Due to coverage of this activity under BFS’s CGIAR Fund II IEE, ECOFISH II is not explicitly included in the USAID/Bangladesh DO4 IEE (Asia-19-013); and
6. An Environmental Mitigation and Monitoring Plan (EMMP) and climate risk analysis will be required.

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¹ The current CGIAR Fund II IEE covers implementation through September 30, 2023.
² In the event that this is not the case, then another MTF may be prepared for concurrence by BEO/BFS and BEO/Asia.
Table 1 provides details of ECOFISH II and the associated Threshold Determinations pertinent to this activity.

Table 1: Threshold Determinations pertinent to ECOFISH II

<table>
<thead>
<tr>
<th>Project/Activity</th>
<th>Main Areas of Intervention</th>
<th>Threshold Determination</th>
<th>Remarks</th>
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</table>
| ECOFISH II       | • Improved science outputs for decision making  
                    • Strengthened adaptive co-management and fisheries governance  
                    • Improved policy support  
                    • Improved livelihood resilience of coastal fishing communities | Categorical Exclusion for research and analysis of technologies, policies, markets and systems, local and national capacity building, which includes trainings, workshops and technical assistance.  
Negative Determination with Conditions (NDC) for any activity which has the potential of negative environmental impact, including livelihoods activities such as solar fish drying, crab fattening, mussel farming, small holder gardening, small-scale refurbishment of fish-landing facilities, minor shelter repairs, and small-scale enhancement of village fish ponds.  
If environmental guidelines do not yet exist, WorldFish will adopt environmental policies and/or guidelines to apply to such aspects which may be based, as appropriate, on other Centers’ policies and/or guidelines and/or other international standards.  
An EMMP and climate risk screening will be required.  
The entire activity is being implemented in sensitive coastal and deltaic ecosystems in areas prone to natural disasters and climate change.  
Pesticides are not being contemplated for this activity.  
CGIAR Centers will also mitigate environmental impacts by utilizing their own established guidelines. | If environmental guidelines do not yet exist, WorldFish shall mitigate environmental impact by utilizing its own established guidelines, as specified in the Threshold Determination of the BFS CGIAR Fund II IEE. If environmental guidelines do not yet exist, WorldFish must adopt environmental policies and/or guidelines to apply to such aspects which may be based, as appropriate, on other Centers’ policies and/or guidelines and/or other international standards. In the event that a center or a research program is found noncompliant with its own established environmental policies, those of the World Bank, or the International Finance Corporation, USAID will raise the issue at the System Council in its role as a member and pursue corrective actions in a multilateral context. |

As the activity has a Threshold Decision of Negative Determination with Conditions, WorldFish shall mitigate environmental impact by utilizing its own established guidelines, as specified in the Threshold Determination of the BFS CGIAR Fund II IEE. If environmental guidelines do not yet exist, WorldFish must adopt environmental policies and/or guidelines to apply to such aspects which may be based, as appropriate, on other Centers’ policies and/or guidelines and/or other international standards. In the event that a center or a research program is found noncompliant with its own established environmental policies, those of the World Bank, or the International Finance Corporation, USAID will raise the issue at the System Council in its role as a member and pursue corrective actions in a multilateral context.
An Environmental Mitigation and Monitoring Plan which documents interventions with possible negative environmental impacts, climate risk management considerations, and mitigation measures planned, establishes the monitoring and reporting protocols to be followed, identifies the indicators to be tracked, identifies the responsible parties, and articulates the schedule of activities, is required for this activity to enhance the USAID Activity Manager’s ability to conduct appropriate environmental monitoring and oversight. WorldFish will also be required to comply with all applicable host country environmental laws and regulations, and applicable obligations under ratified international conventions. The EMMP shall be signed and approved by the WorldFish Chief of Party, WorldFish Environmental Compliance Manager, the USAID Activity Manager, and the USAID MEO/CIL; a final copy will be distributed to the AOR in Washington.

Table 2 provides details of ECOFISH II and the associated climate risk considerations pertinent to this activity.

### Table 2: Climate Risk Management Considerations

<table>
<thead>
<tr>
<th>Project Elements</th>
<th>Climate Risks</th>
<th>Risk Rating</th>
<th>How Risks are Addressed</th>
<th>Next Steps</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improved science outputs for decision making</td>
<td>More frequent and severe extreme weather events</td>
<td>Low</td>
<td>Monitor forecasts; adjust field research as necessary; be flexible; develop contingency plans</td>
<td>N/A</td>
</tr>
<tr>
<td>Strengthened adaptive co-management and fisheries governance</td>
<td>Severe, prolonged heat waves; severe flood events; sea-level rise</td>
<td>Moderate</td>
<td>Build capacity of co-management bodies to adapt to climate shocks and become more resilient</td>
<td>Develop Environmental Mitigation and Monitoring Plan, including climate assessment using CRM tools</td>
</tr>
<tr>
<td>Improved policy support</td>
<td>More frequent and severe extreme weather events</td>
<td>Low</td>
<td>Monitor forecasts; adjust meetings and workshops as necessary; be flexible; develop contingency plans</td>
<td>N/A</td>
</tr>
<tr>
<td>Improved livelihood resilience of coastal fishing communities</td>
<td>Severe, prolonged heat waves; severe flood events; sea-level rise</td>
<td>Moderate</td>
<td>Build capacity of coastal fishing communities to adapt to climate shocks and become more resilient</td>
<td>Develop Environmental Mitigation and Monitoring Plan, including climate assessment using CRM tools</td>
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</table>

**Other pertinent Information:**

USAID/Bangladesh is currently updating its CDCS. The updated 118/119 Tropical Forest and Biodiversity Assessment was approved by the Asia Bureau in November 2019. The ECOFISH II activity builds upon the accomplishments and lessons learned of the original ECOFISH activity, which ran from 2014 until the end of 2019. Key lessons include: The fishing communities need long-term livelihood support and appropriate skill development trainings; alternative livelihood support with goat rearing and vegetable gardening encouraged the participation of women; savings for all Community Savings Group members creates an opportunity for soft loan sources
to help them cope with vulnerabilities during the fishing ban period; ECOFISH changed the behavior of the fishermen, leading them to be more compliant with government laws and regulations; and the co-management approach has created mutual trust between resource users and Department of Fisheries/law enforcing agencies and active engagement of relevant stakeholders is very important in establishing sustainable hilsa co-management.

While ECOFISH II will continue to strengthen co-management organizations and the environmental governance framework of the Hilsa fisheries in the lower Meghna basin, including the new marine protected area of Nijhum Dweep, a majority of the activity’s focus will be to support impoverished fishing communities in Cox’s Bazar District, including along the Bay of Bengal coastline\(^3\) and along the Naf River, which forms a portion of the border between Bangladesh and Myanmar. These fishing communities have been significantly impacted by the Rohingya refugee influx, and for those fishing villages along the Naf River, impacted further by the total fishing ban on the Naf River, imposed beginning in 2017 for security reasons. Environmentally sensitive alternative income generating activities (discussed on page 2) will form a major area of work for the ECOFISH II activity in this area, in addition to undertaking local biological assessments and environmental governance strengthening.

**Compliance Reporting:**
WorldFish will monitor and report on environmental compliance taking into consideration all relevant environmental policies and guidelines and integrate applicable findings into all quarterly and annual technical reports. Reporting will include photographic documentation and site visit reports. The final report will incorporate environmental compliance and mitigation lessons learned from the ECOFISH II activity.

**Limitations:**
This MTF does not cover activities involving: 1) Assistance for the procurement or use 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; 2) Activities involving support to wood processing, agro-processing, industrial enterprises, and regulatory permitting; 3) Assistance, procurement or use of genetically engineered organisms (GEOs as per ADS 211); 4) DCA or GDA programs; and 5) Procurement or use of Asbestos, Lead and Mercury Containing Materials. Any of these actions would require prior approval from USAID.

**Revisions:**
Pursuant to 22 CFR 2 16.3(a)(9), if new information becomes available which indicates that activities to be funded might have "major" and "significant" effect, or if additional activities are proposed that have not been assessed under this IEE, that might be considered "major" and their effects significant, this categorical exclusion and negative determination will be reviewed, revised, and submitted to the Asia Bureau Environmental Officer (BEO) for approval and, if

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\(^3\) Of note: The Bay of Bengal Large Marine Ecosystem Project is a regional initiative to improve regional management of the Bay of Bengal environment and its fisheries.
appropriate, an environmental assessment will be prepared. It is the responsibility of the USAID Activity Manager to keep the Mission Environment Officer and the BEO informed of any new information or changes in the activity that might require revision of this IEE.

From:

Michael Weaver
Natural Resources Officer, Office of Economic Growth

Through:

John Smith-Sraen
Director, Office of Economic Growth

Shahpar Selim
Mission Environmental Officer

Andrei Barannik
Regional Environmental Advisor

William Gibson
Bureau Environmental Officer

Date

2/11/2020

2/20/2020

02/24/2020

02/24/2020

3/16/2020

Distribution:

- AOR (Eric Witte)
- Project Files
- Mission Environmental Officer (Shahpar Selim)
- RLO (Milan Pavlovic)
- OAA (Howard Weston)
- BEO/BFS (Bill Thomas)

Attachments:

- CGIAR Agreement
- Program Description
- CGIAR Fund II IEE
- EMMP Template