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PREPARING THE INITIAL ENVIRONMENTAL EXAMINATION (IEE) ANALYSIS OF ENVIRONMENTAL RISK & MITIGATION

The IEE is a critical element of USAID’s mandatory environmental review and compliance processes under Title 22, Code of Federal Regulations, Part 216 (22 CFR 216) – “Reg 216.”

This fact sheet addresses best practices in writing the Analysis of Potential Environmental Risk (Section 3.0), Environmental Determinations (Section 4.0), and Conditions and Mitigation Measures (Section 5.0).

ANALYSIS OF POTENTIAL ENVIRONMENTAL RISK

This section covers potential impacts of the project/activity on the environmental baseline (Section 2.0 of the IEE). Focus on the **most significant** adverse impacts on the natural environment (air, water, land, etc.). Significant impacts may be:

- Direct (impacts from the project at the same time or place) or indirect (impacts from the project occurring later in time or farther removed geographically but still reasonably foreseeable)
- Short or long term
- Adverse or beneficial
- Distinct (individually from the project) or cumulative (incremental project impacts in conjunction with past, present, or reasonably foreseeable impacts from other actions, regardless of which agency or individual undertakes those actions)
- Resulting from connected actions

Consider all relevant resources that your project/activity may affect, including (but not limited to): critical and non-critical habitat alteration; changes to surface water or groundwater; soil disturbance (i.e., from grading or fill); geologic or seismic concerns; increases in air emissions or noise disturbances; loss of species (especially endangered/protected species); solid or hazardous waste generation; and changes to land tenure, transportation, or traffic. Social impacts derive from the project’s impacts on human and environmental impacts.

Some activities raise **specific considerations**:

- Health and safety impacts must be assessed for activities involving [construction](#) and [pesticides](#)
- Activities in national parks or protected areas trigger social safeguarding [requirements](#)
- The Policy on Promoting the Rights of Indigenous Peoples, [\(PRO-IP\)](#) must be followed for work with indigenous population



REMEMBER

- Ideally, impacts should be separated into tables by project/activity (or sub-activity).
- Be as specific as possible in assessing risks/impacts to enable effective mitigation measures.
- Risks should also be contextualized clearly, as impacts will depend on location.
- Include the implementing partner’s approach to the project/activity, and activity size and scale.
- Ensure you have considered impacts to all relevant resources, focusing on the most significant impacts.

IDENTIFYING MITIGATION MEASURES

Mitigation is the implementation of measures designed to eliminate, reduce, or offset the undesirable effects of a proposed project/activity on the environment. Three categories of mitigation approaches should be considered:

1. Prevention and control measures fully or partially prevent a risk by changing project techniques, adjusting design elements, changing the site, or specifying operating practice.
2. Compensatory measures offset adverse impacts in one area with improvements elsewhere.
3. Remediation measures repair or restore the environment after damage occurs.

RESOURCES FOR ASSESSING ENVIRONMENTAL RISK & IDENTIFYING MITIGATIONS

- [USAID Environmental Compliance Database](#): Searchable public database of approved environmental impact assessments; current or previous IEEs may offer lessons for your project
- [Sector Environmental Guidelines](#): Information on typical impacts and mitigations for common categories of USAID activities (e.g., solid waste, energy, construction)
- [Biodiversity \(Foreign Assistance Act 119\) & Tropical Forestry \(FAA 118\) Analyses](#): Country-specific outlined actions for protecting tropical forests
- Existing project documentation (e.g., Project Development Document, scope of work, concept paper)



If your project takes place in a protected area or involves indigenous populations then refer to the following resources:

- *Consultation with affected communities*: [USAID Policy on Promoting the Rights of Indigenous Peoples \(PRO-IP\)](#); [How-To Guide: Community Engagement](#); [Community Engagement Guide](#); and [Concise Guide to Monitoring Engagement and Verifying Free, Prior, and Informed Consent](#)
- *Social impact assessment, focused on land and resource claims*: [AID Optional Social Impact Assessment Framework](#)
- *Human rights training for park rangers*: [Ranger Training and Best Practice Monitoring Guide](#)
- *Grievance redress mechanisms*: [Grievance and Redress Mechanism for USAID Protected Areas Activities](#)

THINK LIKE THE BEO

The Bureau Environmental Officer (BEO) provides concurrence for the IEE. The BEO has likely never been to your project site, so explain your activity in detail. The BEO needs enough information about possible impacts, proposed mitigation measures, and the recommended environmental determination to approve the Reg 216 document.

FIVE RULES FOR SUCCESS

1. Determine potential impacts for each activity
2. Specify actionable mitigation measures commensurate to **each** impact
3. Make mitigations commensurate to impacts
4. Use clear, uncluttered language
5. Do **not** simply cut and paste language from other documents; impacts and mitigations **should be tailored** to your project/activity

QUESTIONS ABOUT THE IEE PREPARATION

Please contact Agency Environmental Coordinator Teresa Bernhard tbernhard@usaid.gov

RESOURCES

[USAID Sector Environmental Guidelines](#)
[22 CFR 216: USAID's Environmental Impact Assessment Process](#)

MAKING A RECOMMENDED ENVIRONMENTAL DETERMINATION

Recommended environmental determinations for your project/activity must correlate to the IEE analysis. The threshold determination is based on the significance of direct, indirect, and cumulative adverse impacts from both the activity and connected actions and excludes consideration of the benefits. Key factors to consider in assessing significance are intensity, duration, frequency, reversibility, and probability in the local context.

For each action/sub-activity, an IEE makes one of the following recommendations:

- **Categorical Exclusion:** No adverse impacts – the activity falls into the categories of identified Categorical Exclusion activities in 22 CFR 216(c)(2)(1) and/or 22 CFR 216(c)(2)(2) and does not require mitigation or monitoring.
- **Negative Determination:** No significant adverse impacts – the activity does not require mitigation measures but could require indicator monitoring through an Environmental Mitigation and Monitoring Plan (EMMP).
- **Negative Determination with Conditions:** No significant adverse impacts – the activity requires specified mitigation measures and indicator monitoring through an EMMP. In some cases, these mitigation measures are established to mitigate a Positive Determination.
- **Positive Determination:** Significant adverse impacts are possible – the activity requires a scoping statement followed by a full Environmental Assessment, Environmental Impact Statement, or activity redesign.
- **Deferral:** Insufficient information to evaluate impacts – activity cannot be implemented until more information is available.

The mitigation measures and indicator monitoring become mandatory elements of activity implementation and are included as requirements in solicitations and awards.



EXAMPLE ACTIVITY WITH ILLUSTRATIVE IMPACTS AND MITIGATIONS

ACTIVITY OR ACTION	IMPACT	MITIGATION MEASURE
Construction of a new hospital wing	<i>Effluent discharges or runoff may degrade water quality and harm the aquatic environment</i>	<i>Adopt management features to protect water courses: no borrow pits within 50 m of a watercourse; no direct discharges or discharge of contaminated substances to surface watercourses</i>
	<i>Clearing the construction site may require deforestation, eliminating habitat</i>	<i>Plant trees in a new location to compensate</i>
Supporting agricultural extension services for intensification	<i>Increased use of fertilizers can increase nutrient runoff and pollution of waterbodies</i>	<i>Adhere to a soil fertility management framework, ensuring that fertilizers are matched to crop needs in type, amount, and time and place of use</i>
	<i>Fertilizers may cause human health hazards (skin irritation or poisoning) if not properly handled</i>	<i>Provide training on safe fertilizer use and storage, including warnings of hazard risk and instructions on the use of personal protective equipment</i>