

November 17, 2003

When is an IEE or an IEE amendment needed?

[Chapter 1](#) of the Environmental Procedures Training Manual advises the following:

“The [USAID environmental] procedures apply to **all** new projects, programs, or activities authorized or approved by USAID. They also apply to substantive amendments or extensions of ongoing projects, programs, or activities. Thus under Regulation 216, nearly all projects and programs require some form of environmental documentation. The documentation is an integral part of the program or project proposal; **no irreversible commitment of resources can take place until the environmental documentation is approved by USAID.**”

That’s pretty clear in most respects, but there are grey areas that merit further exploration. How exactly do we define “substantive” amendments of a project, program or activity? And what sorts of extensions trigger IEE amendments, and what sorts do NOT?

What is a “substantive” amendment of a project, program or activity?

This is not a clear cut matter, so it requires the mission to use judgement. The definitions of “substantive” that seem the most relevant here are, “1. Substantial; considerable; 4. Of or relating to the essence or substance; essential: substantive information.” In other words, the only changes to a program, project or activity that would merit an IEE amendment are those that amount to a “substantial” change affecting the essence of the activity. Of particular interest in determining whether a change is substantial is the question of whether the changes have the potential to affect the environment in a manner different from that explored in the active IEE or CE.

Here are some examples of program/project/activity amendments that would NOT trigger an IEE amendment:

- A change that does not affect the description of the activity, e.g. the introduction of a new implementing partner;
- A change in the location of an activity, unless the new site were somehow substantially more sensitive than the site previously anticipated;
- The planning of an activity which, from the standpoint of contract and deliverables management is considered a “new activity,” but which can reasonably be considered to fall within the IEE’s description of activities to be undertaken by the program in question.

Here are some examples of program/project/activity amendments that WOULD trigger an IEE amendment:

- The addition of an activity that clearly falls outside the IEE’s description of activities to be undertaken;
- A change in an activity’s nature which substantially increases the potential impact on the environment, e.g. a CBNRM program that adds “timber extraction” to the list of forest utilization options the program will promote with local communities.

What sorts of extensions trigger IEE amendments, and what sorts do NOT?

The Africa Bureau's current rule of thumb for a extension of a program/project/activity involving the addition of funds is that an IEE amendment is called for if more than \$1 million is being added. (A case might be made for that being changed to a percentage basis.)

A no-cost time extension for a program/project/activity does not generally trigger an IEE amendment. The only situation in which one might envision an IEE amendment being triggered by a no-cost time extension is if the acceptability of a potential environmental impact identified in the IEE were in part related to the time-limited nature of the program in question.