



Canadian Rotary Committee for International Development

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Environmental Sustainability Policy & Procedures

1. Environmental Sustainability

Introduction:

Effective development depends on the successful integration of many factors: economic, social, political, cultural and environmental. Environmental quality and sustainability have a special importance to development because the environment is the very basis of human life.

Therefore, environmental sustainability is a fundamental part of development because there is interdependence between the world's environment – the physical, biological and social surroundings and their interactions that sustain life – and the objectives of human development.

In the developing world, the priority of individuals and governments is often short-term survival, frequently at the expense of the environment. In such cases poverty becomes both the cause and the effect of environmental degradation. Protection of the environment may therefore go hand in hand with the fight against poverty.

CRCID's Operational Objectives:

CRCID's mandate is "to support sustainable development in developing countries, in order to reduce poverty and to contribute to a more secure, equitable and prosperous world." As such, CRCID has integrated environmental considerations into the following operational objectives:

1. To ensure that environmental considerations, including opportunities for enhancing environmental sustainability, are integrated into project planning and implementation, taking into account the needs and views of the beneficiaries and local communities.
2. To promote and support projects that directly address environmental issues;
3. To support those implementation measures that minimize negative environmental impacts and enhance environmental benefits of projects, or assist in the identification of alternatives;
4. To encourage and support Canadian and offshore Rotary Clubs and third party non-Rotary NGOss to develop projects that further the objectives of environmental sustainability;

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President **Chair** **Executive Director** **C.A.O.**
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5. To contribute to the development of knowledge and experience in Canada and in developing countries, on undertaking environmentally sustainable forms of development;
6. To promote education and awareness among Rotarians in Canada and in developing countries of the importance of environmentally sustainable approaches to development.

CRCID Guidelines:

When Canadian Rotary Clubs submit project applications to receive financial contributions from CRCID, the applications will be assessed according to the following environmental protection policies and regulations:

1. **Environmental Sustainability.** Environmental sustainability is an important component of sustainable development. CRCID will assess the environmental impact of each project application during the initial evaluation and at all stages of implementation.
2. **The Canadian Environmental Assessment Act (CEAA).** This federal legislation is applied whenever a federal authority (i.e. CIDA) exercises one or more of the following duties, powers or functions in relation to a project (Act, Section 5): proposes a project; sells, leases, or otherwise transfers control or administration of land to enable a project to be carried out; **contributes money or any other form of financial assistance to a project**; exercises in relation to the project a regulatory duty (such as issuing a license, permit and approvals) that is included in the Law List regulation.

CRCID Compliance:

For CRCID to be eligible for CIDA funding it must be in compliance with CIDA's environmental requirements. Any projects with potential environmental implications should conduct an environmental analysis during its planning stages and the results integrated into the submitted CRCID application. A projects identified by CRCID as involving physical works (see definitions) that are not on the exclusion list (see definitions) or if there is a significant environmental impact are required to conduct an environment assessment.

However, in cooperation with the environmental specialist at CIDA, CRCID has developed an implementation process (see factsheet P-7) that is effective but will not dramatically increase the reporting workload for the partners planning and implementing the project.

Definition of Terms:

Canadian Environment Assessment Act (CEAA):	Act	Act of parliament that came into effect in January 1995. It is a tool utilized to assess the environmental effects of projects requiring federal action or decisions. It ensures that the environmental effects of projects are considered as early as possible in a project's planning stages. The Act sets out, for the first time in Canadian legislation, the responsibilities and procedures for carrying out the environmental assessments of projects that involve the
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federal government.

CEAA Applicable Project:	Any proposed construction, operation, modification, decommissioning, abandonment or other undertaking in relation to a physical work.
Environment:	All of the factors and circumstances that surround an organism or group of organisms and have an impact on their development and survival (i.e. biophysical and social environments) http://www.ohiou.edu/esl/project/environment/defs.html
Environment Analysis:	This is a tool designed to integrate environmental considerations into the project planning process. The report will provide sufficient environmental information to determine if the CEAA will apply to the proposed project. It is integrated with the CRCID application form.
Environment Assessment:	If the project is a physical work and the CEAA applies then the project will require the submission of an environmental assessment that provides detailed environmental information and mitigation measures. CRCID will build the EA from information already received and from additional information requested from the project planners. The final report is subject to a CIDA environmental audit.
Environmental Effect:	Any positive or negative change that the project may cause in the environment, including any effects of any such change on health and socio-economic conditions, on physical and cultural heritage, on the current use of lands and resources for traditional purposes by aboriginal persons or on any structure, site or thing that is of historical, archaeological, paleontological, or architectural significance."
Environment Sustainability:	Recognizing the limits that the natural world places on economic development and growth and stressing the importance of ecological integrity to maintain Earth's life – support systems.
Exclusion List:	List of certain projects not requiring an environmental assessment because the environmental effects in relation to physical works are insignificant. (e.g. building construction less than 100m ² , less than 5m high & greater than 30m from water body).
Mitigation Measures:	Measures that effectively control, eliminate or significantly reduce a project's adverse environmental effects. They may include changing the location of a project to a more appropriate site; modifying the design, plan, implementation period and construction techniques; or using environmentally friendly production procedures and techniques or replacement technologies that conserve

energy, prevent the emission of pollutants, reduce waste, promote recycling and so on.

Physical Work: A physical structure with a fixed location.

Sustainable Development: Development that meets the present needs of the beneficiaries without compromising the ability of future generations to meet their own needs.

2. Environmental Assessment Procedures

Introduction:

CRCID is committed to complying with the promotion of sustainable development through environmentally sound policies and projects as stipulated in CRCID's contribution agreement with CIDA and fact sheet E-4, Environmental Sustainability.

The environmental tool that is being utilized to meet CIDA's and CRCID's goal of Sustainable Development is the environmental assessment. The Canadian Environment Assessment Act (CEAA) and its regulations have established the environmental assessment requirements and the procedures that apply to those projects defined by the Act as involving physical works (for definitions please see Fact Sheet E-4).

CRCID Compliance:

With CRCID's commitment to comply with CIDA's environmental guidelines, CRCID has, with the assistance of an environmental specialist at CIDA, developed an implementation process that meets the requirements without dramatically increasing the burden upon those Rotarians planning and implementing the projects.

Process: (see flowchart on page 6)

The Environmental Analysis report, which is required for those projects with potential environmental implications, is now integrated with the CRCID application form. By integrating it with the application form it eliminates the requirement of Rotarians submitting an additional document to CRCID.

A completed Environment Assessment checklist (see Appendix 2) must be attached to the submitted program or project application. This checklist indicates what project activities are **exempt** from an Environmental Assessment. If the checklist is not included or is not provided within a reasonable amount of time after being requested by the CRCID Program Officer, the application request will be refused.

During the application review process, the CRCID Secretariat will determine if the CEAA applies to the proposed project, i.e. if an Environmental Assessment must be conducted. It is expected that less than 10% of CRCID funded projects will actually require an Environmental Assessment.

If an assessment is required, CRCID will **NOT** require the program or project partners to complete a new report. The Secretariat will only request the information that is still required to fulfill the Environment Assessment report requirements. The Secretariat will "build" the assessment according to the reporting guidelines (see below) from the information received from the Canadian contact who will have received this information from a reliable and credible source at the project site.

Once the Secretariat has completed building the assessment, one copy will be placed in the project file and another copy will be placed in a designated Environment Assessment File. The Environment Assessments that are on file will be subject to CIDA review and audit.

Environment Assessment Reporting Guidelines:

The appropriate level of effort and detail in an environmental assessment report (see appendix 4) will depend on the project's nature, scope and location. It is anticipated that the majority of the reports required for CRCID funded projects will only be a few pages long. However, each report must include the following components:

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|------------------------------------|-------------------------|----------------|
| 1. Project Description; | 4. Methodology | 7. Mitigation |
| 2. Host Country legislation; | 5. Analysis of effects; | 8. Follow-up; |
| 3. Description of the environment; | 6. Public concerns; | 9. Conclusion. |

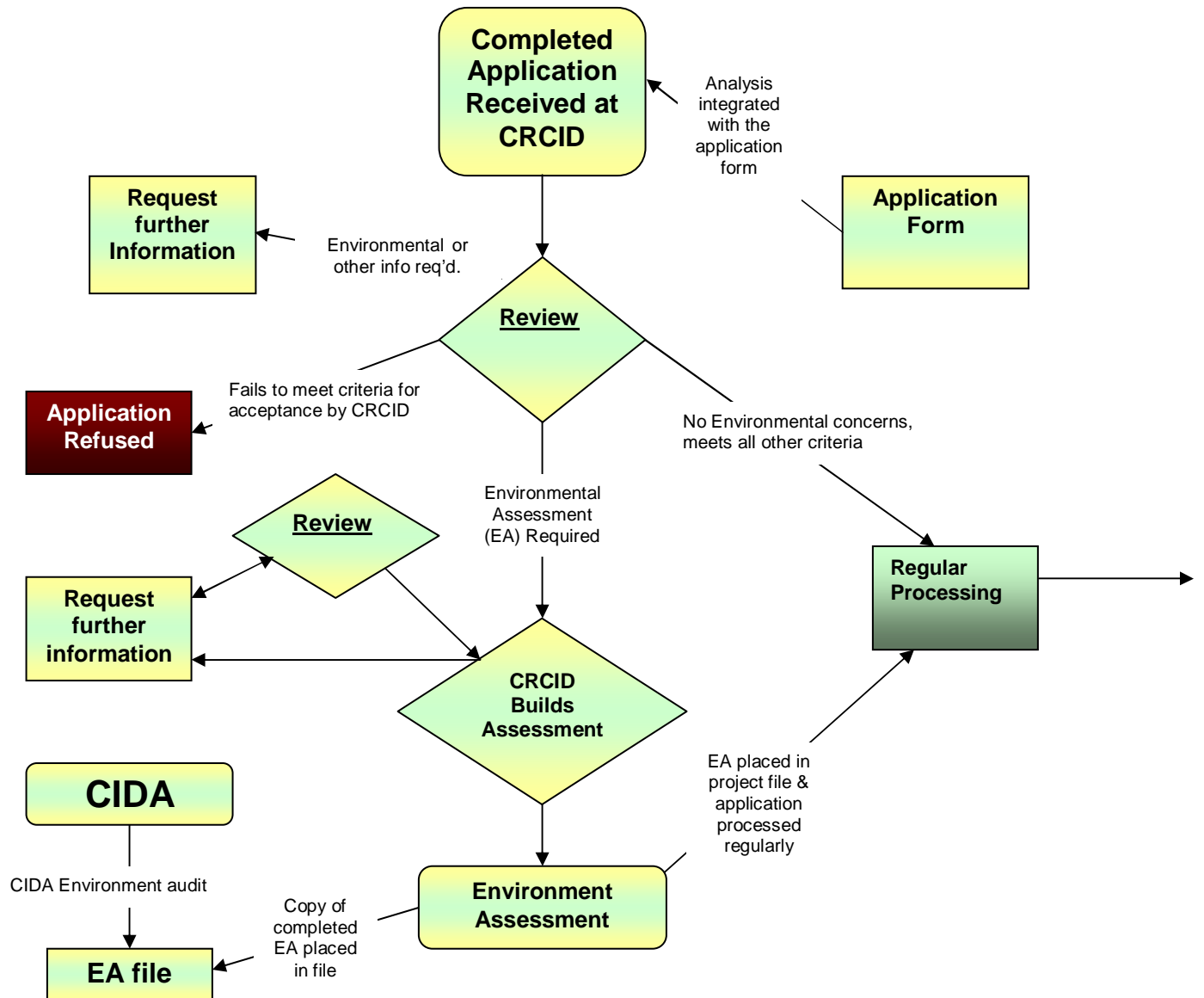
The details for these 9 components can be found in the CIDA's Handbook on Environmental Assessment of Non-Governmental Organizations and Institutions. 1997: Minister of Public Works and Government Services Canada, 12-16.

Implementation & Monitoring:

During the implementation of a development project the interim reports submitted to CRCID must also report the results of any environmental mitigation measures being implemented. The final report must also report upon the success or failure of these mitigation measures in relation to the completed project.

When the project is monitored, the monitoring report will include an evaluation of the accuracy / effectiveness of the environmental assessment and its mitigation measures.

CRCID Flowchart of the Process Used to Evaluate Program and Project Applications According to Environmental Considerations



3. REFERENCE DOCUMENTS

Canadian:

International:

4. APPENDICES

1. Application processing instructions
2. Environmental Assessment Checklist
3. Environmental Assessment processing instructions
4. Environmental Assessment Report template

APPENDIX 1: Application Processing Instructions:

1. CRCID Program Officer reviews the submitted application;
2. Determine if the Canadian Environmental Assessment Act (CEAA) applies to the proposed project by reviewing the environment checklist, or if there appears to be a significant environmental impact (i.e. the project is not CEAA applicable but will dramatically affect the biophysical and/or socio-economic environment);
3. If the program proposal or project application fails to provide sufficient information to make an informed decision regarding the project's impact upon the environment, the CRCID Program Officer will request further information that will clarify the environmental impact of the project;
4. If an assessment is required, the CRCID Program Officer will complete as much of the Environment Assessment report as possible from the available information as indicated in CIDA's Environment Handbook (pg. 12-16);
5. The Program Officer will request the submission of any additional information required to complete the Environment Assessment report from the Canadian Program Coordinator or Project Contact;
6. The CRCID Program Officer will review the submitted information and if:
 - a. The information is acceptable, complete the assessment according to the reporting guidelines from the information received from the Canadian contact, who will have received this information from a reliable and credible source at the project site;
 - b. The information is NOT acceptable, request additional information from the Program Coordinator or Project Contact before completing the report.
7. Once the environmental assessment report is complete, one copy must be placed in the project file and another copy placed in a designated Environment Assessment File. The Environment Assessments that are on file will be subject to CIDA review and audit.
8. Program Proposal or Project Application will be processed as usual.
9. The Program or Project will be refused if:
 - a. The information received continues to be inadequate after a reasonable number of attempts are made by the CRCID Program Officer to elicit this information; or,
 - b. No information is received after a reasonable number of attempts are made by the CRCID Program Officer to elicit this information.
 - c. After all of the information has been received and reviewed there appears to be a significant negative impact upon the environment.

APPENDIX 2: ENVIRONMENTAL ASSESSMENT CHECKLIST

Program Name: _____

Project/Program No. _____

Reviewed By: _____

Date of Review: _____

1. DOES THE PROJECT ENTAIL ANY PHYSICAL WORK, CONSTRUCTION, OPERATION, MODIFICATION, DECOMMISSIONING OR ABANDONMENT OF A PHYSICAL WORK?	YES [] NO []
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If the answer is "YES" proceed to question 2.
 If the answer is "NO" then no further action is required

2. TYPES OF PROJECTS/ACTIVITIES FOR WHICH AN ENVIRONMENTAL ASSESSMENT IS NOT REQUIRED:

To complete this section of the checklist, identify the activity or activities that most closely relate to the project. Determine if the project activities are listed under the Exemption Criteria column. If the activities are exempt then enter "YES" in the final column, indicating that an environmental assessment is not required and proceed with regular processing. If the activities that most closely relate to your project are not exempt, then enter "NO" in the final column. This indicates that the project will require an environmental assessment. Proceed with regular processing. The CRCID Secretariat will review the submission and verify whether or not an Environmental Assessment is necessary. If an assessment is required, the Secretariat will assist you in completing this report.

Please note that this checklist only identifies those project activities that a Rotary organization (e.g. club, District, RAG) could implement whereby an Environmental Assessment could apply under the Canadian Environment Assessment Act. For a complete list of projects exempt from Environmental Assessments review the list at <http://www.iijcan.org/en/ca/laws/regu/sor-2007-108/latest/sor-2007-108.html>

PROJECT ACTIVITY	ENVIRONMENTAL ASSESSMENT REPORT EXEMPTION CRITERIA	EXEMPT YES/NO
Any Project Activities are exempt if:	<ul style="list-style-type: none"> ➤ There is no release of polluting substances into a water body. 	
ENERGY		
Construction or installation of an electrical transmission line, other than an international electrical transmission line (if international: Voltage < 50kV + Extension < 4 km outside the country) is exempt if:	<ul style="list-style-type: none"> ➤ Voltage less than 130kV ➤ Not carried out beyond an existing right of way ➤ Supporting structures not placed in or on a water body ➤ Along side a road, railway line, electrical power line, telecommunication line or any other linear physical work 	
Expansion or modification of a telecommunications or electrical transmission line, other than an international electrical transmission line is exempt if:	<ul style="list-style-type: none"> ➤ Extension less than 10% ➤ Along side a road, railway line, electrical power line, telecommunication line or any other linear physical work ➤ Not carried out beyond an existing right of way ➤ Supporting structures not placed in or on a water body 	
Construction, installation or modification of a switching station associated with a telecommunication or electrical transmission line is exempt if:	<ul style="list-style-type: none"> ➤ Voltage less than 130kV ➤ Not carried out beyond an existing right of way ➤ Greater than 30 metres from a water body 	
Construction, installation, expansion, or modification of a radio communication antenna and its supporting structure	<ul style="list-style-type: none"> ➤ Greater than 30 metres from a water body ➤ Antenna & structure affixed on an existing building ➤ Antenna & structure situated less than 15m from a building ➤ Antenna, structure & lines: footprint less than 25 sq. metres 	
Construction, installation, operation, expansion, modification, decommissioning or removal of a receptacle and its base and	<ul style="list-style-type: none"> ➤ Footprint is less than 25 meters ➤ Is carried out on land 	

enclosure, if any, that is to be used exclusively for the collection, delivery or storage of mail is exempt if:		
Construction, installation, operation, expansion or modification of a radio communication antenna and its supporting structure within 30 m of a body of water is exempt if:	<ul style="list-style-type: none"> ➤ Antenna and supporting structure are affixed to a building ➤ Antenna height no more than 5 metres and a height equal to 25% of building height to which it is affixed 	
WATER		
Reinstallation, expansion, modification, or demolition of an existing wharf or breakwater accessible by land is exempt if:	<ul style="list-style-type: none"> ➤ Surface area increase is less than 10% ➤ Not carried out below the high-water mark ➤ Involves no heavy machinery on the substrate ➤ Involves no dredging or use of explosives ➤ Involved removal from water before demolition 	
Construction, expansion, modification or demolition of a structure such as a belt storage depot, net repair area or petrol cabin or other structure associated primarily with fishing is exempt if:	<ul style="list-style-type: none"> ➤ Located on land and associated with fishing or the use of small pleasure crafts ➤ Floor area less than 100 sq. metres and height is less than 5 metres ➤ To be carried out on land 	
Construction, installation, expansion or modification, removal of a fish habitat improvement structure, or device used for the capture or enumeration of fish for resource management purposes is exempt if:	<ul style="list-style-type: none"> ➤ No use of heavy machinery 	
Construction, installation, expansion or modification of a hydrant or hookup system is exempt if:	<ul style="list-style-type: none"> ➤ Part of an existing farm or municipal system of water distribution ➤ No crossing of a water body 	
TRANSPORTATION		
Construction, installation, expansion or modification of an automatic warning structure or traffic control signal structure at a railway level crossing is exempt if:	<ul style="list-style-type: none"> ➤ On or within the existing railway right of way 	
Expansion or modification of an existing pavement or gravel area within the boundary of an airport is exempt if:	<ul style="list-style-type: none"> ➤ Extension less than 10% ➤ Greater than 30m from a water body 	
Modification of an existing oil and gas pipeline, sewer, drain or a culvert that is not connected to a water body is exempt if:	<ul style="list-style-type: none"> ➤ Crosses under a railway or road ➤ Not connected to a water body ➤ On or within the existing railway right of way 	
Modification, other than a deviation, of an existing railway track or bed is exempt if:	<ul style="list-style-type: none"> ➤ Greater than 30m from a water body 	
Expansion or modification of an existing road or road crossing is exempt if:	<ul style="list-style-type: none"> ➤ Carried out on an existing right of way ➤ No extension and widening less than 15% ➤ Greater than 30m from a water body 	
FOREST		
Expansion or modification of a drainage structure, other than a drainage structure de drainage connected to a water body, on forested land is exempt if:	<ul style="list-style-type: none"> ➤ Extension less than 10% 	
Construction, installation, expansion, or modification of a temporary camp used for scientific or technical research, or for reforestation is exempt if:	<ul style="list-style-type: none"> ➤ In use fewer than 200 person-days ➤ Greater than 30 metres from a water body 	
AGRICULTURE		
Construction, expansion or, modification of an existing irrigation structure or of a centre pivot or side roll sprinkler on agricultural land is exempt if:	<ul style="list-style-type: none"> ➤ Greater than 30 metres from a water body 	
Construction, installation, operation expansion, or modification of a domestic or farm water supply well, pump house, water tank loading facility, dugout, or drainage structure is exempt if:	<ul style="list-style-type: none"> ➤ On agricultural land ➤ More than 30m from a water body 	

Construction, installation, operation, modification or removal of a structure intended to house wild animals is exempt if:	<ul style="list-style-type: none"> ➤ Structure has footprint no more than 5 sq. metres ➤ Does not house species raised for commercial purposes ➤ No use of heavy machinery within 30 m of a water body 	
The proposed construction, installation, operation, expansion or modification of a building located on agricultural land is exempt if:	<ul style="list-style-type: none"> ➤ Building is essential to the practice of farming and is not to be used to store a polluting substance ➤ On a serviced building lot ➤ Construction or installation footprint no more than 750 sq. metres ➤ Expansion will be 10% larger than footprint ➤ Greater than 30m from water body 	
INFRASTRUCTURE		
Construction, installation, expansion or modification of a building is exempt if:	<ul style="list-style-type: none"> ➤ Footprint less than 100 sq. metres and height less than 5 metres ➤ Greater than 30 metres from a water body ➤ Height increase & footprint less than 10% 	
Operation of a nursing station or health center is exempt if:	<ul style="list-style-type: none"> ➤ Floor area no more than 1,000 sq. metres or a treatment center floor area no more than 2000 sq. metres ➤ Greater than 30m from a water body 	
Construction, expansion, or modification of a sidewalk, boardwalk, fence, parking lot (capacity of 10 automobiles or fewer), or of a ramp, door or handrail to facilitate wheelchair access is exempt if:	<ul style="list-style-type: none"> ➤ Continuous to an existing building ➤ Less than 30m from a water body ➤ Footprint, height and length increase less than 10% ➤ Construction or installation less than 100 m in length ➤ Greater than 3 metres from a water body ➤ On a serviced building lot ➤ Does not affect permafrost 	
Construction, operation, expansion or modification of a parking lot is exempt if:	<ul style="list-style-type: none"> ➤ Does not affect permafrost ➤ Construction less than 500 sq. metres ➤ Expansion less than 10% ➤ Greater than 30m from a water body 	
Demolition of an existing building is exempt if:	<ul style="list-style-type: none"> ➤ Floor area less than 1,000 sq. metres ➤ Greater than 30m from another building ➤ Greater than 30m from a water body 	
Construction, installation, operation, expansion, modification or removal of a fence that prevents the passage of wild animals	<ul style="list-style-type: none"> ➤ Construction or installation is entirely within 30 metres of non-linear physical work ➤ Expansion length and/or height is no more than 35% of current length or height ➤ Greater than 30 metres from a water body 	

APPENDIX 3: Environmental Assessment processing instructions

Note: If the Environmental Assessment report is required it will be drafted by the CRCID Program Officer based upon information received from the submitted application and follow-up information received from the Canadian Project Contact.

1. CRCID Program Officer will review the submitted application, including the completed Exemption Checklist;
2. It will be determined if the Canadian Environmental Assessment Act applies to the proposed project, (i.e. if an Environmental Assessment must be conducted - see environment checklist) or if there appears to be a significant environmental impact (i.e. the project is not CEAA applicable but will affect the biophysical environment). It is expected that less than 10% of CRCID funded projects will actually require an Environmental Assessment;
3. If an assessment is required, the CRCID Program Officer will complete as much of the Environment Assessment report as possible from the available information;
4. If additional information is required, the CRCID Program Officer will request the information that is required to complete the Environment Assessment report from the Canadian Program Coordinator or Canadian Project contact;
5. The CRCID Program Officer will review the submitted information;
6. If the information is acceptable, the Program Officer will complete the assessment according to the reporting guidelines from the information received from the Canadian contact, who will have received this information from a reliable and credible source at the project site;
7. The CRCID Program Officer will distribute the completed draft of the report to the appropriate Sectoral Committee Chair who will share the report with the membership of the committee. The report will be reviewed for any errors or omissions and if more information is required. If more information is recommended then processing returns to #4 above.
8. Once the environmental assessment report is complete and both the CRCID Program Officer and Sectoral Committee are satisfied, it will be sent to the Program Coordinator or Project contact for verification and signature. A signed original of the report must be returned to CRCID.
9. The CRCID Program Officer will make 2 copies of the report that will be placed in:
 - a. The project file; and,
 - b. A designated Environment Assessment File. The Environment Assessments that are on file will be subject to CIDA review and audit.
10. The Program or Project will be refused if:
 - a. The information received continues to be inadequate after a reasonable number of attempts are made by the CRCID Program Officer to elicit this information; or,
 - b. No information is received after a reasonable number of attempts are made by the CRCID Program Officer to elicit this information.
 - c. After all of the information has been received and reviewed there appears to be a significant negative impact upon the environment.
11. If after all of the information has been received and reviewed and there still appears to be a significant negative impact upon the environment, the project will be refused.

APPENDIX 4: ENVIRONMENTAL ASSESSMENT REPORT

Revised July 2009

Program Name _____

Country of
Implementation: _____

Project Name
(if applicable) _____

CRCID Sectoral
Priority: _____

Date submitted
to CRCID _____

Date Reviewed by
CRCID _____

Each of the following sections must be completed and included in the Environmental Assessment Report.

1. Project description

This section should describe the type of project, project activities and planned implementation time frame as well as the project's size, scope and location. This section may also include the project's environmental objectives, the project's purpose, the alternatives considered and the rationale for selecting an option. Maps, drawings, and photos may be provided, showing the location, the arrangement of the structures, the site and its surroundings.

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2. Host country legislation

This section should describe the host country legal requirements with respect to the environment, which have an effect on the project as well as methods planned to meet these requirements.

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3. Description of the environment

This section should provide an overview of the features of the environment, specifying the extent to which the environment has already been disturbed or is particularly fragile. The following areas should be covered, where relevant to the project: the biophysical environment (e.g., type of environment, such as tropical forest, savanna; main features of the landscape; characteristics of soils, hydrographic network and groundwater; topography; air quality; natural resources; climate; features that are particularly fragile, sensitive or important from an ecological or socio-economic point of

view) and the human environment (e.g., human settlements, such as villages, roads, utilities; land use and planning; socio-economic activities; quality of life; population density; sanitary conditions; social structure; cultural values; customs and ways of life; sites of spiritual, heritage, historical, cultural or archaeological importance). Maps, drawings and photos are often useful.

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4. Methodology

This section should describe sources of information, information gathering methods and methods of assessing effects.

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5. Analysis of effects

This section should describe your project's environmental effects and their significance, particularly: the positive and adverse effects on the biophysical and human environment (for example, improved health conditions, sanitation and cleaner or more abundant drinking water or health problems caused by air or water pollution); the environment's effect on the project (for example, due to floods, erosion, earthquakes, water level fluctuations); cumulative effects; and, the effects of potential accidents or malfunctions. You can consult checklists to help identify environmental effects of specific sectors of activity.

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6. Public concerns

This section should describe public concerns and expectations with respect to the project; controversial points that have been raised and answers to concerns.

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7. Mitigation measures

This section should describe the mitigation measures, which will be implemented to avoid or reduce adverse environmental effects and increase the positive effects of the project. Here are some examples of mitigation measures:

- locating the project far from sites that are fragile or of particular value,

- using environmentally friendly waste management practices,
- protecting waterways, implementing erosion reduction measures,
- implementing measures to increase or improve services to adversely affected populations,
- implementing economic development measures,
- applying environmental ethics during construction work,
- conducting environmental awareness programs, etc.

This section should also describe the residual effects, their significance and uncertainty factors.

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8. Follow-up

If a follow-up program is required, this section should describe items to be monitored, follow-up methods and responsibilities.

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9. Conclusion of the environmental assessment

The environmental assessment report must determine whether or not the project will have significant adverse environmental effects, in view of the mitigation measures that will be taken.

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10. Signature Page:

**For Canadian Rotary Collaboration for
International Development**

Date (Month DD, YYYY)

Signature

Witness _____
Signature

Name

Name

Title

Title

For the Club

Date (Month DD, YYYY)

Signature (club President)

Witness _____
Signature (Program Coordinator)

Name

Name

Title

Title