



**USAID**  
FROM THE AMERICAN PEOPLE

# **USAID's Environmental Procedures: The Big Picture**

USAID Staff and Partners  
Environmental Compliance/ESDM Training  
Pakistan ▪ Afghanistan ▪ April 2009

# Why the procedures?

- ❖ **ESDM:**  
a key objective for the **ethical and effective practice of development**
- ❖ Achieving ESDM requires **explicit and systematic attention** to environmental issues in program development and implementation
- ❖ **USAID's Environmental Procedures:**
  - *an EIA-based process* intended to assure that this 'explicit and systematic attention' actually occurs over LOP



# USAID's EIA & Sustainability Mandate

## An “environmental failure”

1974

*In 1974, USAID provided highly concentrated Malathion to poorly trained field workers on an agricultural project in [Pakistan](#)*

*Working without protective equipment in the heat, the workers sprayed each other.*

*5 died.*

1975

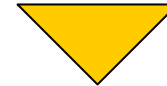
Sued by US NGOs, USAID ultimately faced a choice: *develop environmental safeguard procedures or shut down.*

USAID settled out of court, agreeing to develop such procedures.



First a court mandate

Then a mandate in law:



§117 of the FAA requires that USAID:

- **utilize an EIA process** to evaluate the potential impact of USAID's activities on the environment prior to implementation
- “**fully take into account**” **environmental sustainability** in designing and carrying out its development programs.



# USAID's EIA & Sustainability Mandate

USAID's **Environmental Procedures** are the response to these mandates. They consist of:

- ❖ **Federal regulations:** 22 CFR 216 ( "**Reg. 216**" ) and
- ❖ **Mandatory Agency Policies** as set out in USAID's Automated Directives System (ADS), (especially 201.3.12.2.b and 204.)

**Compliance with the procedures is mandatory.**

**They apply to every program, project, activity, and amendment supported with USAID funds.**



# THE BIG PICTURE:

## What do the procedures require?

- 1 The procedures specify an EIA process that must be applied to all activities **before** implementation
- 2 This process frequently results in environmental management conditions (mitigative & monitoring measures).
- 3 These measures must be implemented and monitored over the life of the activity/project (LOP).

# A little more detail:

## Key LOP env. compliance requirements

- 1. Environmental considerations must be taken into account in activity planning .**
- 2. No activities may be implemented without *approved Reg 216 environmental documentation.***
- 3. Any resulting mitigation and monitoring conditions are:**
  - 1. written into contract instruments.**
  - 2. implemented, and this implementation is monitored**

**This documentation is the result of an EIA process**

**Monitoring via field inspections and review of routine project reports submitted by implementing partners**

# Key LOP env. compliance requirements

**4. Environmental compliance is assessed in Annual Reports**

Reported annually by operating unit

**5. Environmental compliance documentation is maintained.**

As part of the program or activity record and used to manage program implementation

For more information, see the “Environmental Procedures Briefing for Mission Staff” in the sourcebook

# Who is responsible

## USAID

**Establishes/approves environmental mitigation & monitoring conditions. Verifies compliance.**

## In the Mission

**Fundamental responsibility & accountability:**

- **SO Team Leader**
- **each CTO or Activity Manager**
- **ultimately with the Mission Director.**

**MEO is generally a compliance advisor and coordinator.**

## Implementing Partners

**Implement mitigation and monitoring conditions in project activities & report to USAID.**

**Often responsible for design of detailed environmental mitigation and monitoring plan (EMMP) in response to mitigation and monitoring conditions established by the Reg. 216 documentation.**

# Looking ahead

## ❖ This session: the “big picture” only

### ❖ Coming up:

- *Reg 216 (the pre-implementation EIA process)*
- *Reg 216 documentation (the IEE)*
- *Implementing environmental mitigation & monitoring conditions*
  - Building environmental compliance requirements into procurement instruments
  - Environmental Mitigation and Monitoring Plans



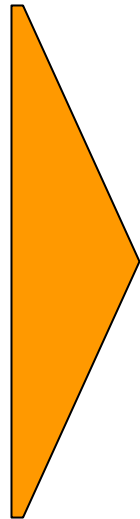
# The final message

USAID's environmental procedures are not an exercise in paperwork. **They should result in environmentally sound design & management.**



**At a minimum, this requires compliance.**

**(Especially implementation and monitoring of all conditions.)**



**GO BEYOND THE MINIMUM!**

**use the process to proactively address environmental issues & build capacity for environmentally sound design.**