USAID
Environmental Procedures for Sub-Projects

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

What are sub-projects?

Subprojects are. . .

Smaller activities executed under a larger project or program

e.g. a subgrant program, an "umbrella project"

!

Subprojects are a problem for Reg. 216.

Why?

What is the problem?

1. Sub-projects are often not defined when the project is proposed & the IEE written

2. But the first step of any EIA (including Reg. 216) process is understanding the activity!

Understand the proposed activity

Why is the activity being proposed?

What is being proposed?

Screen the activity

Based on the **nature** of the activity what level of environmental review is indicated?

! 3. Reg. 216 requires review of activities BEFORE funds are obligated

How do we solve this “prior review” problem?

Two conditions must be met:

1. **General nature of sub-project activities must be known.**
2. **These activities must have low or easily controllable potential adverse impacts.**

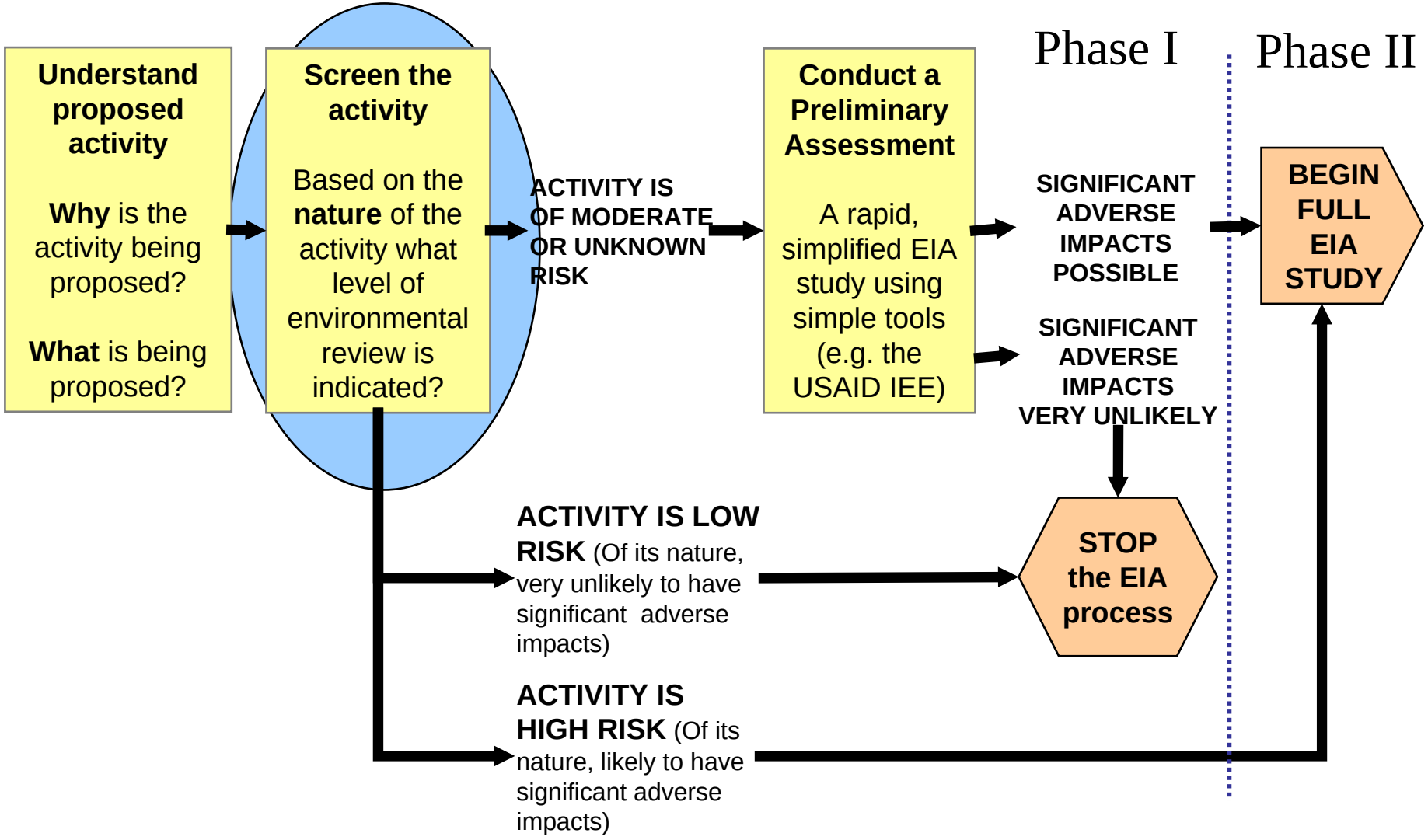
IF these conditions are met, sub-project activities can be approved conditionally.

- *That is, the IEE contains a **negative determination with conditions***
- *Condition is that each sub-project is subject to simplified EIA procedures*

Getting started

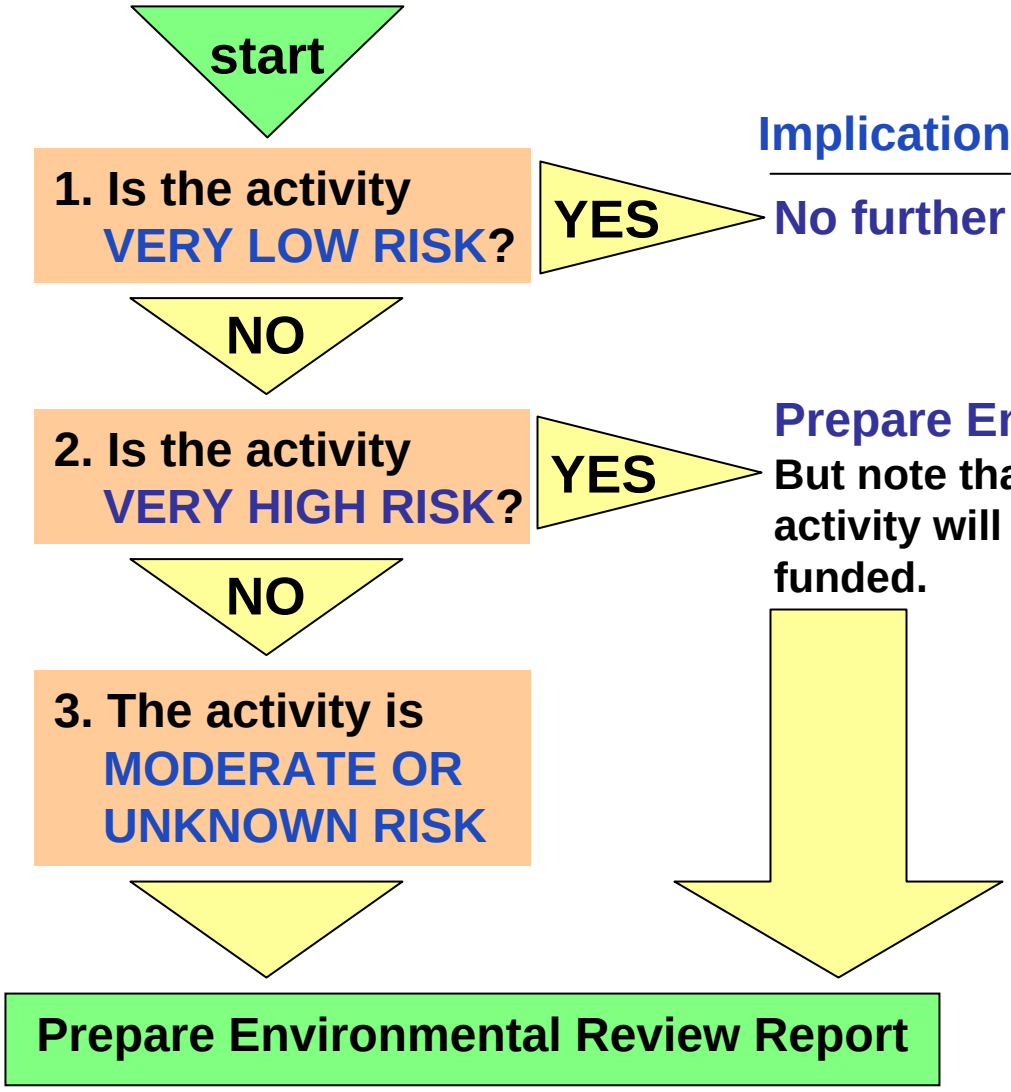
Sub-project review starts the same way that all EIA processes start. . .

The first steps: Understand, then screen



USAID sub-project procedures. Visit www.usaid.gov/our_work/environment/compliance/ane/index.htm & www.encapafrica.org

Screening under sub-project procedures



*Environmental Review Report = a "preliminary assessment"

How do we screen?

The ENVIRONMENTAL REVIEW FORM (ERF) guides us step-by-step:

1. **LIST each activity**
2. **CHECK EACH activity against two lists**
   - A list of “very low risk” activities
   - A list of “very high risk” activities
3. **RECORD the screening result for each activity**
   - 3 possible results:
     very low risk,
     very high risk,
     moderate/unknown risk

B. Activities, screening results, and recommended determination

Proposed activities (continue on additional page if necessary)	Screening result (Step 3 of instructions)			Recommended Determinations (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities)		
	Very Low Risk	High Risk*	Moderate or unknown risk*	No significant adverse impact	With planned mitigation, no significant adverse impact	Significant Adverse impact
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						

*These screening results require completion of an Environmental Review Report

What is an activity?

✓ **An activity is:**

a desired accomplishment or output

E.g.: a road, seedling production, or river diversion to irrigate land

Accomplishing an activity requires a set of actions

ACTIVITY:	ACTIONS:
market access road rehabilitation	Survey, grading, culvert construction, compaction, etc. . .

! Screening is done at the activity level, NOT the action level. .

Examples of "very low risk" & "very high risk" activities

Some very low risk activities	Some VERY HIGH RISK activities
Education, technical assistance, or training. (except for activities directly affecting the environment)	River basin or new lands development
Community awareness initiatives	Planned resettlement of human populations
Technical studies not involving intrusive sampling of endangered species or critical habitats	Penetration road building
	Drainage of wetlands or other permanently flooded areas

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What about "moderate or unknown risk" activities?

By definition, IF an activity is

- **NOT "very high risk"**
- **AND NOT "very low risk,"**

THEN it IS "moderate or unknown risk"

The form lists some REPRESENTATIVE moderate risk activities

! This list is not exhaustive!

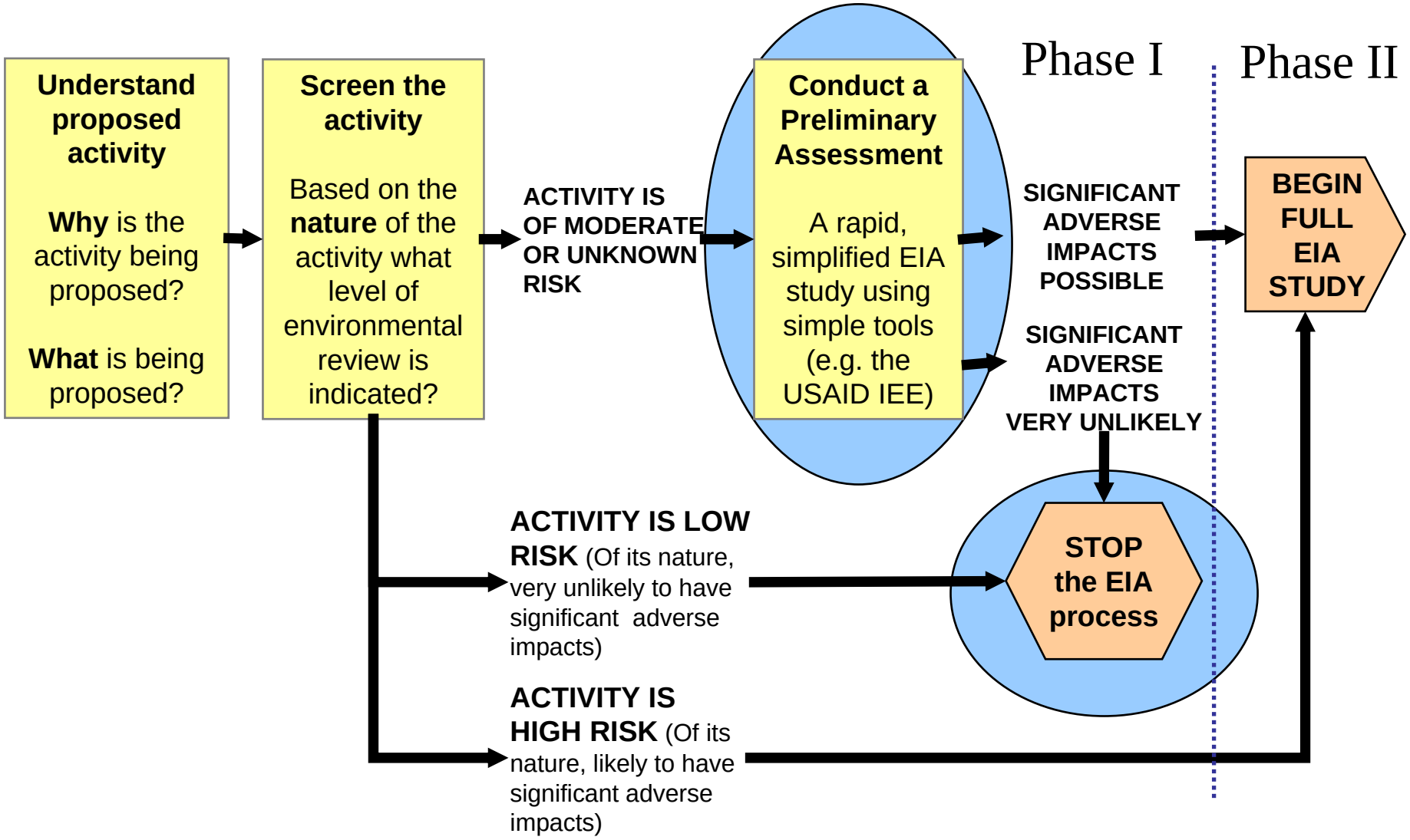
Moderate-risk activities include. . .

Small-scale infrastructure with known potential to cause environmental harm

Quantity imports of fertilizers

Field agricultural experimentation of MORE than 4 ha.

After screening, what next?



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After screening, 2 possibilities....

1. **If ALL activities are "very low risk," environmental review process ends→ sign and submit!**

2. **If ANY activities are:**
   - **moderate/unknown risk OR**
   - **very high risk**

an Environmental Review Report (ERR) must be completed.

Environmental Review Report

1. Background, Rationale and Outputs/Results Expected
2. Activity Description
3. Environmental Situation
4. Evaluation of Activities with Environmental Impact Potential
5. Environmental Mitigation Actions (including monitoring and evaluation)
6. Other information (photos, references, individuals consulted)

ERR Purpose

Like any preliminary assessment the purpose of the ERR is to. . .

Provide documentation and analysis that:

- **Allows the preparer to recommend <u>whether or not significant adverse impacts are likely</u>**
- **Allows the reviewer to agree or disagree with the preparer's recommendations**
- **Sets out mitigation and monitoring for adverse impacts**

What recommendations result from an ERR?

ERR Recommendations

For EACH:

- **Moderate/unknown risk activity**
- **Very high risk activity**

You make one of 3 recommendations:

ERR Recommendations
1. No significant adverse impacts
2. With specified mitigation and monitoring, no significant adverse impacts
3. Significant adverse

Note:

If the recommendation is determination is

“With specified mitigation and monitoring, no significant adverse impacts,”

the mitigation & monitoring becomes REQUIRED parts of project implementation & monitoring.

Final steps

RECORD the recommendations

SIGN the certification

SUBMIT the Environmental Review Form & ERR

WAIT for approval from reviewer before expending any resources on the activity

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*These screening results require completion of an Environmental Review Report

What about the signed certification?

The certification:

- **Affirms that the ERF & ERR are correct & complete**
- **Commits your organization to implementing the mitigation and monitoring measures specified in the ERR**
- **Commits your organization to making sure that field staff, managers & partners understand environmentally sound practices for the activities in question.**

! The certification is a binding commitment!

! A submitted ERF/ERR is NOT automatically accepted!

The Reviewer may:

 **Accept** **OR**  **Reject**

The screening results and recommendations.

OR the reviewer may return the ERR and require more information & analysis

What if you find “significant adverse impacts”

Remember:

Activities subject to these procedures should have very low or easily controllable potential adverse impacts.

Therefore, findings of “significant adverse impacts” should happen very rarely.

If it does happen, the reviewing authority will do one of three things:

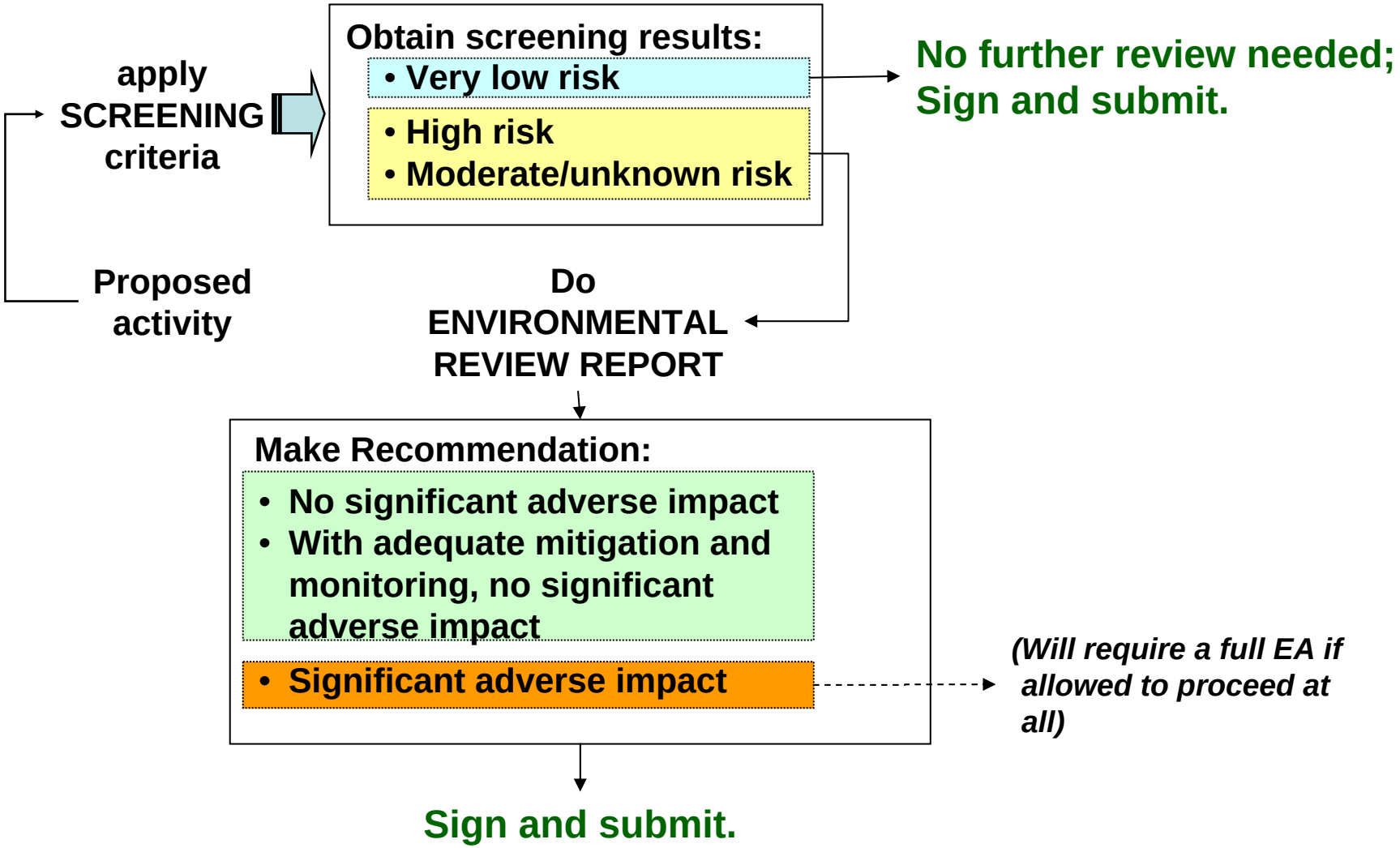
- **Deny funding to the activity**
- **Require that the activity be revised**
- **Require a full EA**

!

If a screening result is “very high risk” or an ERR finding is “significant adverse impacts,” immediately contact the reviewing authority.

Discussions will be necessary!

Overview of the process



Adapting the ERF to project needs

The ERF is a GENERAL form. It should be adapted each time it is used.

For example:

1 Adapt the screening lists

Change lists of low-risk & high-risk activities to reflect specific sub-project activities, and specific local environmental issues.

2 Create "standard mitigation" (best practices) for specific activities.

Standard mitigation/best practices for specific activities can save the effort of drafting repetitive ERRs.

Such activities could fall into a 4th screening category: "moderate risk with standard mitigation."

Activities in this category would not require an ERR, but would be required to follow the standard mitigation measures developed by the project.

3 Don't use the ERF at all!

The ERF is not the only option for sub-project review. Project-specific checklists and other approaches are possible.

The final message

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

! **At a minimum, this requires compliance with the sub-project review procedures.**

(Especially implementation of all mitigation and monitoring measures.)

GO BEYOND THE MINIMUM!

use the sub-project review process to proactively address environmental issues & build capacity for environmentally sound design.