USAID
Environmental Procedures for Sub-Projects

Environmental Compliance/ESDM Training Workshops
Takoradi, Ghana • March 2012
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!

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

- 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?
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 environmental review
The Environmental Review Form (ERF) is the most commonly-used subproject review instrument/process. The ERF is usually completed by the IP or their subgrantee. ERF is being updated—included in sourcebook.
Getting started with the ERF

Sub-project review starts the same way that all EIA processes start. . .
Sub-project review starts the same way that all EIA processes start: understand, then screen.

**Understand 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?

**Conduct a Preliminary Assessment**
- A rapid, simplified EIA study using simple tools (e.g. the USAID IEE)

**Phase I**
- Activity is of moderate or unknown risk
  - Significant adverse impacts possible
  - Significant adverse impacts very unlikely
  - Begins full EIA study

**Phase II**
- Activity is low risk (Of its nature, very unlikely to have significant adverse impacts)
  - Start implementation

- Activity is high risk (Of its nature, likely to have significant adverse impacts)
  - Begin full EIA study
Screening under sub-project procedures

1. Is the activity VERY LOW RISK?
   - YES: No further review is necessary.
   - NO: Prepare Environmental Review Report

2. Is the activity VERY HIGH RISK?
   - YES: Prepare Environmental Review Report*
   - NO: Prepare Environmental Review Report

3. The activity is MODERATE OR UNKNOWN RISK
   - Prepare Environmental Review Report

*Environmental Review Report = a “preliminary assessment”

Implication
How do we screen?

The ENVIRONMENTAL REVIEW FORM (ERF) guides the process 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
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

<table>
<thead>
<tr>
<th>ACTIVITY:</th>
<th>ACTIONS:</th>
</tr>
</thead>
<tbody>
<tr>
<td>market access road rehabilitation</td>
<td>Survey, grading, culvert construction, compaction, etc. . .</td>
</tr>
</tbody>
</table>

Screening is done at the activity level, NOT the action level.
### Examples of “very low risk” & “very high risk” activities

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

- Small-scale infrastructure with known potential to cause environmental harm
- Field agricultural experimentation of MORE than 4 ha.

This list is not exhaustive!

**Moderate-risk activities include...**
After screening, what next?

Understand 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?

Conduct a Preliminary Assessment
ACTIVITY IS OF MODERATE OR UNKNOWN RISK
ACTIVITY IS LOW RISK (Of its nature, very unlikely to have significant adverse impacts)
ACTIVITY IS HIGH RISK (Of its nature, likely to have significant adverse impacts)
A rapid, simplified EIA study using simple tools (e.g. the USAID IEE)

Phase I
SIGNIFICANT ADVERSE IMPACTS POSSIBLE
SIGNIFICANT ADVERSE IMPACTS VERY UNLIKELY

Phase II
BEGIN FULL EIA STUDY
START IMPLEMENTATION
After screening, 2 possibilities....

1. If ALL activities are "very low risk," environmental review process ends \( \rightarrow \) 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. Summary of Proposal
2. Description of Activities
3. Site-specific environmental Situation & Host Country Requirements
4. Environmental Issues, Mitigation Actions, and Findings
5. EMMP
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 whether or not significant adverse impacts are likely
• 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?
For EACH:

- Moderate/unknown risk activity
- Very high risk activity

The IP recommends one of 3 findings:

1. significant adverse impacts very unlikely
2. With specified mitigation and monitoring, significant adverse impacts very unlikely
3. Significant adverse impacts are possible
Final steps: the IP...

- RECORDS the findings
- SIGNS the certification
- SUBMITS the Environmental Review Form & ERR to the C/AOTR
- WAITS for approval before expending any resources on the activity

<table>
<thead>
<tr>
<th>B. Activities, screening results, and findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed activities (Provide DESCRIPTIVE listing. Continue on additional page if necessary)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Screening result (Step 3 of instructions)</th>
<th>Findings (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities ONLY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very Low Risk</td>
<td>High-Risk*</td>
</tr>
<tr>
<td>1.</td>
<td>[ ]</td>
</tr>
<tr>
<td>2.</td>
<td>[ ]</td>
</tr>
<tr>
<td>3.</td>
<td>[ ]</td>
</tr>
</tbody>
</table>
What about the signed certification?

The certification:

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

### Who approves?

<table>
<thead>
<tr>
<th></th>
<th>Always</th>
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<tbody>
<tr>
<td>C/AOTR</td>
<td></td>
</tr>
<tr>
<td>MEO</td>
<td></td>
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<tr>
<td>REA</td>
<td></td>
</tr>
<tr>
<td>BEO</td>
<td>if any screening results are “high risk”* or if there are any findings of “significant adverse impacts possible”*</td>
</tr>
</tbody>
</table>

*should be very rare
Overview of the process

**Proposed activity**

**SCREENING criteria**

- Very low risk
- High risk
- Moderate/unknown risk

**Obtain screening results:**

- No further review needed; Sign and submit.

**Do ENVIRONMENTAL REVIEW REPORT**

**Make Recommendation:**

- No significant adverse impact
- With adequate mitigation and monitoring, no significant adverse impact

- Significant adverse impact

  (Will require a full EA if allowed to proceed at all)

**Sign and submit.**

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**
   
   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!**
   
   Project-specific checklists and other approaches are possible.