Environmental Compliance Reporting

GEMS Environmental Compliance-ESDM Training Series

Ghana ▪ January, 2017

SESSION OBJECTIVES:

- Understand USAID criteria for environmental compliance reporting.

- Review role of EMMP in the reporting process.

- Discuss "mainstreaming" of project environmental performance for reporting purposes.

- Learn how to "environmentalize" key project indicators.

THE EMMP IS IN PLACE …NOW WHAT?

- Now that <u>the</u> EMMP is being implemented, **USAID needs to know what's <u>actually happening</u>!**

  - *Project reporting must provide an auditable record of environmental compliance.*

  - *One or more key project performance indicator(s) (project results framework) should reflect overall environmental soundness/ environmental compliance.*

LET'S LOOK AT #1 FIRST

WHAT DOES THE ADS SAY?

Team Leaders and Activity Managers or C/AORs must actively manage and monitor compliance with any IEE/EA conditions, modifying or ending activities not in compliance. (ADS 202.3.6 , 204.3.4 and 303.2.f)

PREPARING "AN AUDITABLE RECORD" OF COMPLIANCE

- Environmental compliance reporting can be integrated as part of 'regular' project reporting.

  – Quarterly or semi-annual project reports should contain a separate section addressing environmental compliance.

  – The section must provide *sufficient information on the status of EMMP implementation for USAID to effectively fulfill its oversight and performance monitoring role.*

Any specific reporting requirements contained in the IEE must also be addressed	Title II partners must submit an annual Environmental Status Report (ESR) with their PREP Submission

EMMP MONITORING LOG CAN SIMPLIFY REPORTING

If the EMMP contains a "monitoring record" section, simply attach the EMMP to the quarterly or semi-annual reporting document.

Mitigation Measure	Responsible Party	Monitoring Scheme			Est. Cost	Monitoring Log		
		Indicators	Data source/ Method	How Often		Date	Result	Follow-up
3. Install & properly operate canal-level flow regulation structures	Project agricultural technician	• # of doors and other flow-control structures installed •% of Ha. under flow control •% of secondary & tertiary canals showing significant erosion damage after each growing season	Reports Field visit	Quarterly				
4. Protect upper slope with fruit (mangoes, citrus, avocado) and forest trees	Project agricultural technician	# of trees planted and survived • % of at-risk upper slope land protected • total m3 of sediment removed from canals over each rainy season.	Reports Field visit Comparison with baseline information	Quarterly /Annual				

The irrigation rehabilitation EMMP from the session on EMMPs

COMPLEX EMMPS REQUIRE DETAILED REPORTING

- Larger projects, or those with complicated EMMPs may require more detailed reporting to create an auditable record.

  - A text summary or short analysis of EMMP implementation is needed.

    - *Highlight key mitigation activities underway in the reporting period;*

    - *Any significant issues encountered; and*

    - *Corrective actions/adjustments made.*

  - Stand-alone Environmental Compliance reports may also be warranted (e.g., quarterly or semi-annual)

NOW ON TO REQUIREMENT #2:

"MAINSTREAMING" ENVIRONMENTAL PERFORMANCE

- Environmental issues can be integrated, or "mainstreamed" into the project results framework for reporting purposes.

- This does *NOT* mean that:
  - Every mitigation measure must be captured in core indicators.
  - Every core program indicator must be "environmentalized."

- This IS to say that *overall*, project success must be partly measured on the most critical elements of environmental soundness/ compliance.

What is Reporting Requirement #2 again? …

"One or more key project performance indicator(s) (project results framework) should reflect overall environmental soundness & compliance."

This applies to new awards...

Where EMMPs are developed after the PMP is established, it may not be possible to change key program indicators.
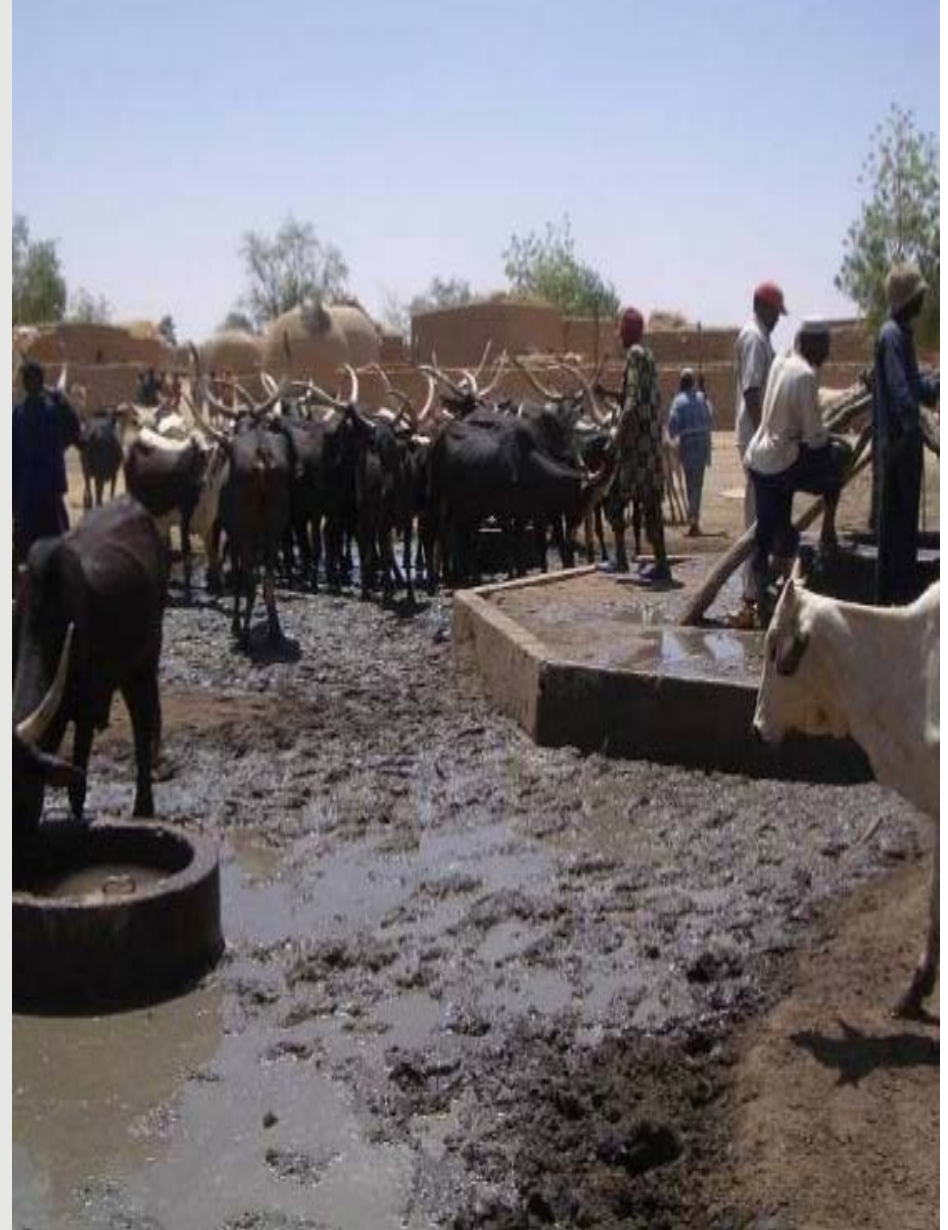
BRINGING ENV. ISSUES INTO RESULTS FRAMEWORK

EXAMPLE: WATER POINT PROVISION

- Key Program Indicators:

    - PROTECTED* water points established.

    - # beneficiaries receiving water from PROTECTED water points.

    - % of water points with no fecal coliforms per 100 ml.

    - % of water points established that are clean after 6 months.

*Protected = fenced against livestock, drained

This intervention will NOT show good performance...

BRINGING ENV. ISSUES INTO RESULTS FRAMEWORK

EXAMPLE: FOOD FOR PEACE

- How much firewood does a typical Food for Peace (FFP) program use?

  - ~1 kg firewood/person/day x 70,000 beneficiaries x 365 d

  ~30,000 MT of firewood/yr.

- Mitigation:

  - Improved cook stoves and cooking practices

- Added to key program indicators:

  - Amount of fuel saved by improved practices

  - Amount of <u>time</u> saved by improved practices

NOT just number of stoves distributed

"ENVIRONMENTALIZING" PROJECT INDICATORS
EXAMPLE: ROAD REHABILITATION

- Typical Indicator:

  – Km of road rehabilitated.

- Strengthened, "Environmentalized" indicator:

  – Km of road rehabilitated under environmentally sound practices.*

  *provide definition of environmentally sound practices from EMMP

USAID REVIEW OF ENVIRONMENTAL REPORTING

WHO REVIEWS EMMPS & ENVIRONMENTAL COMPLIANCE REPORTING INSIDE USAID?

WILL ENVIRONMENTAL COMPLIANCE CHECKS BE PART OF MISSION M&E?

As with all other aspects of the project, the COR or AOR is the primary reviewer.

But the MEO and M&E function may also be involved.

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