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# **USAID Environmental Procedures for Sub-Projects**

Environmental Compliance/ESDM Training Workshops  
Takoradi, Ghana ■ March 2012

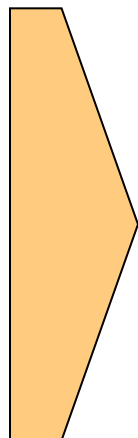


# What are sub-projects?

**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.**

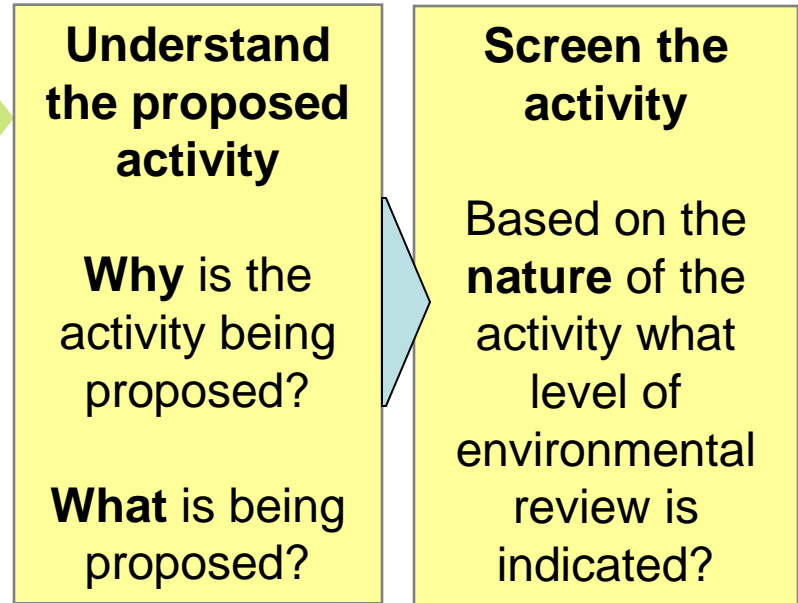
**Why?**

# 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!

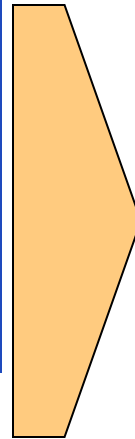
**!** 3. Reg. 216 requires review of activities **BEFORE** funds are obligated



# 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*

*What is a “simplified environmental review process”*



**The Environmental Review Form (ERF) is the most commonly-used subproject review instrument/process.**

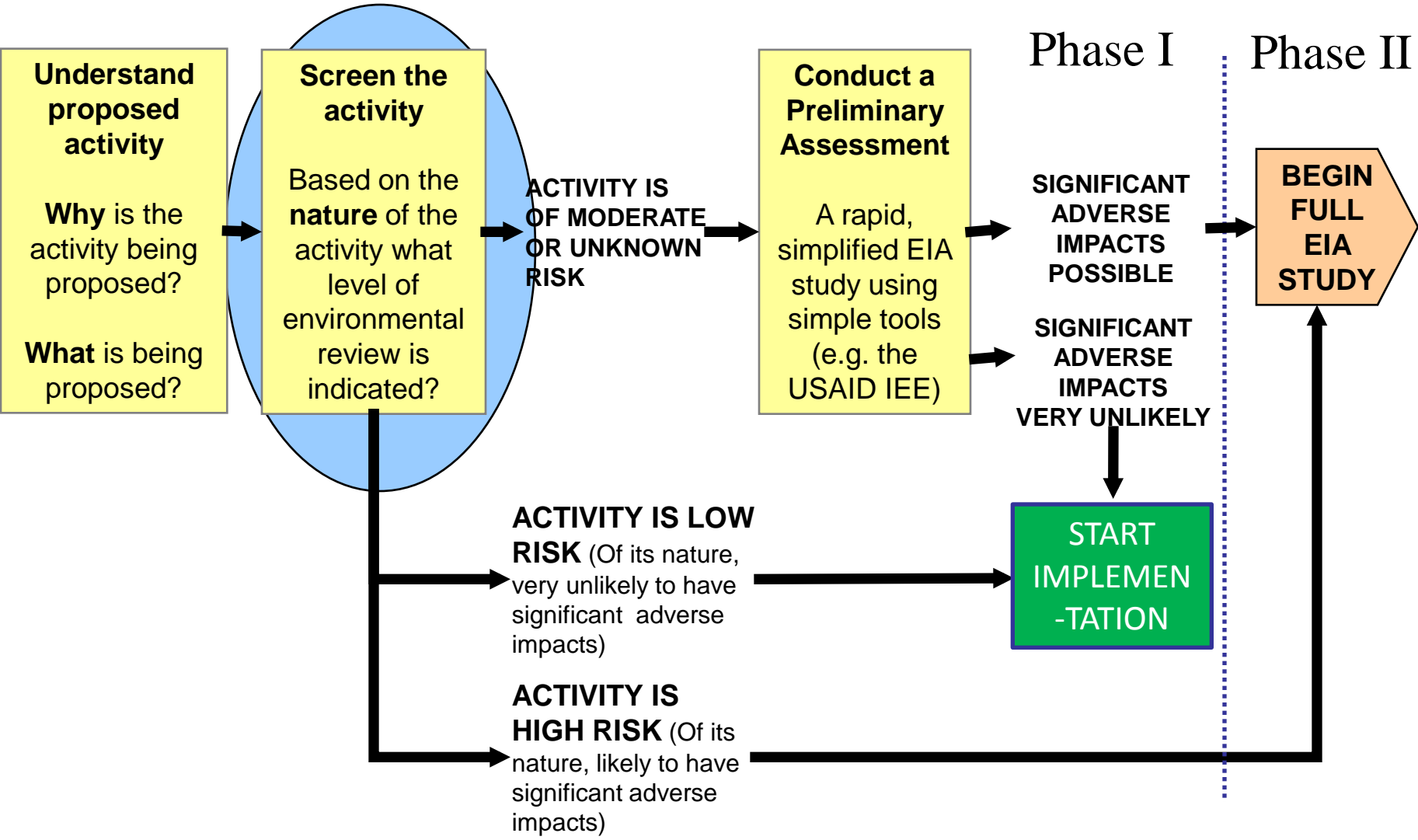
**The ERF is usually completed by the IP or their subgrantee.**

**ERF is being updated—included in sourcebook**

# Getting started with the ERF

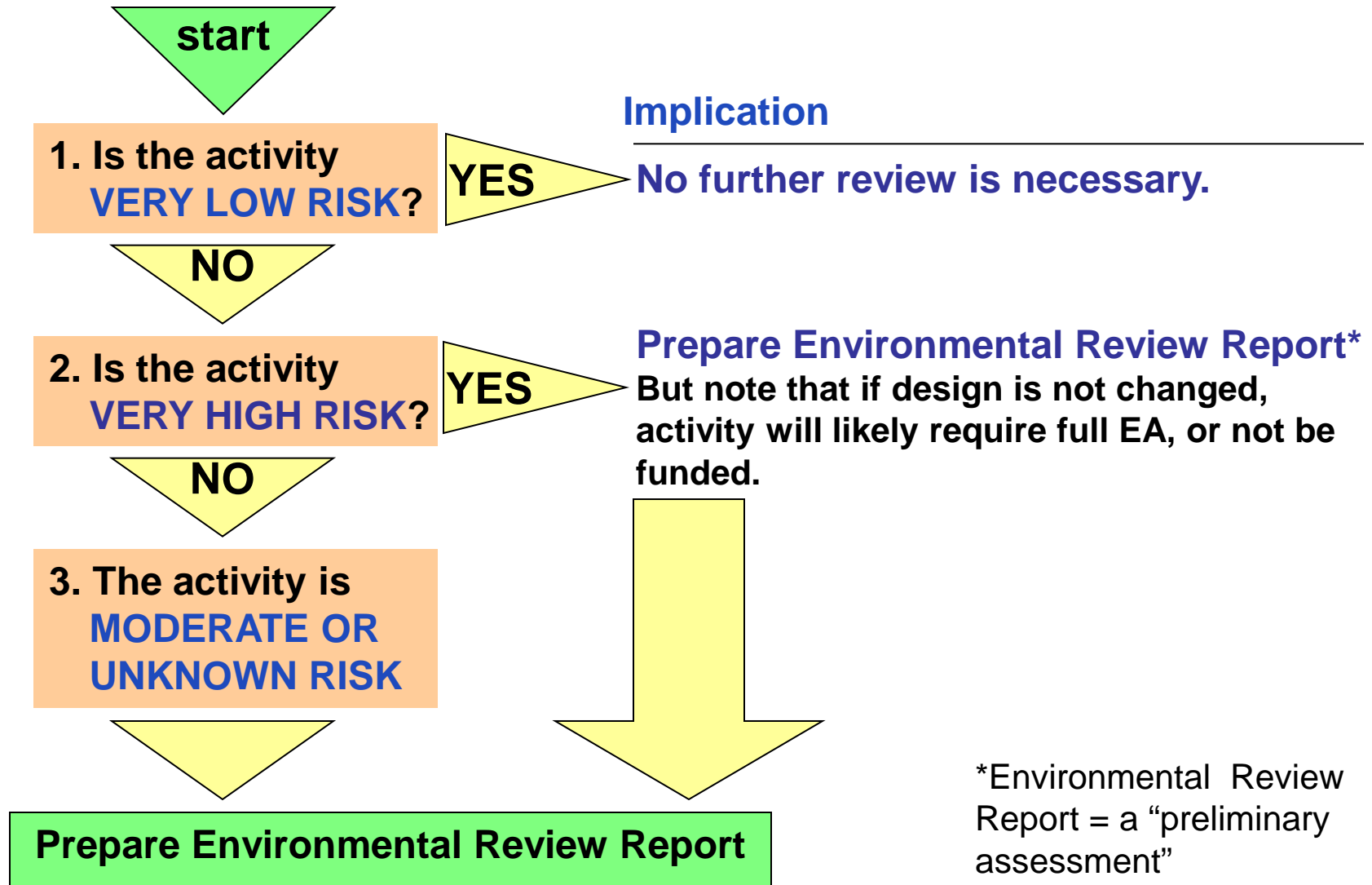
**Sub-project review  
starts the same way  
that all EIA processes  
start. . .**

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





# Screening under sub-project procedures







# 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

B. Activities, screening results, and findings

Proposed activities (Provide DESCRIPTIVE listing. Continue on additional page if necessary)	Screening result (Step 3 of instructions)			Findings (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities ONLY)		
	Very Low Risk	High-Risk*	Moderate or unknown risk*	significant adverse impacts are very unlikely	With specified mitigation, significant adverse impacts are very unlikely	Significant Adverse Impacts are possible
1.						
2.						
3.						

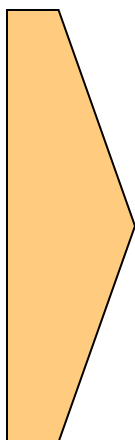
# What is an activity?



**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:**

market access  
road  
rehabilitation

**ACTIONS:**

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

**Education, technical assistance, or training. (except for activities directly affecting the environment)**

**Community awareness initiatives**

**Technical studies not involving intrusive sampling of endangered species or critical habitats**

## Some VERY HIGH RISK activities

**River basin or new lands development**

**Planned resettlement of human populations**

**Penetration road building**

**Drainage of wetlands or other permanently flooded areas**

# 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

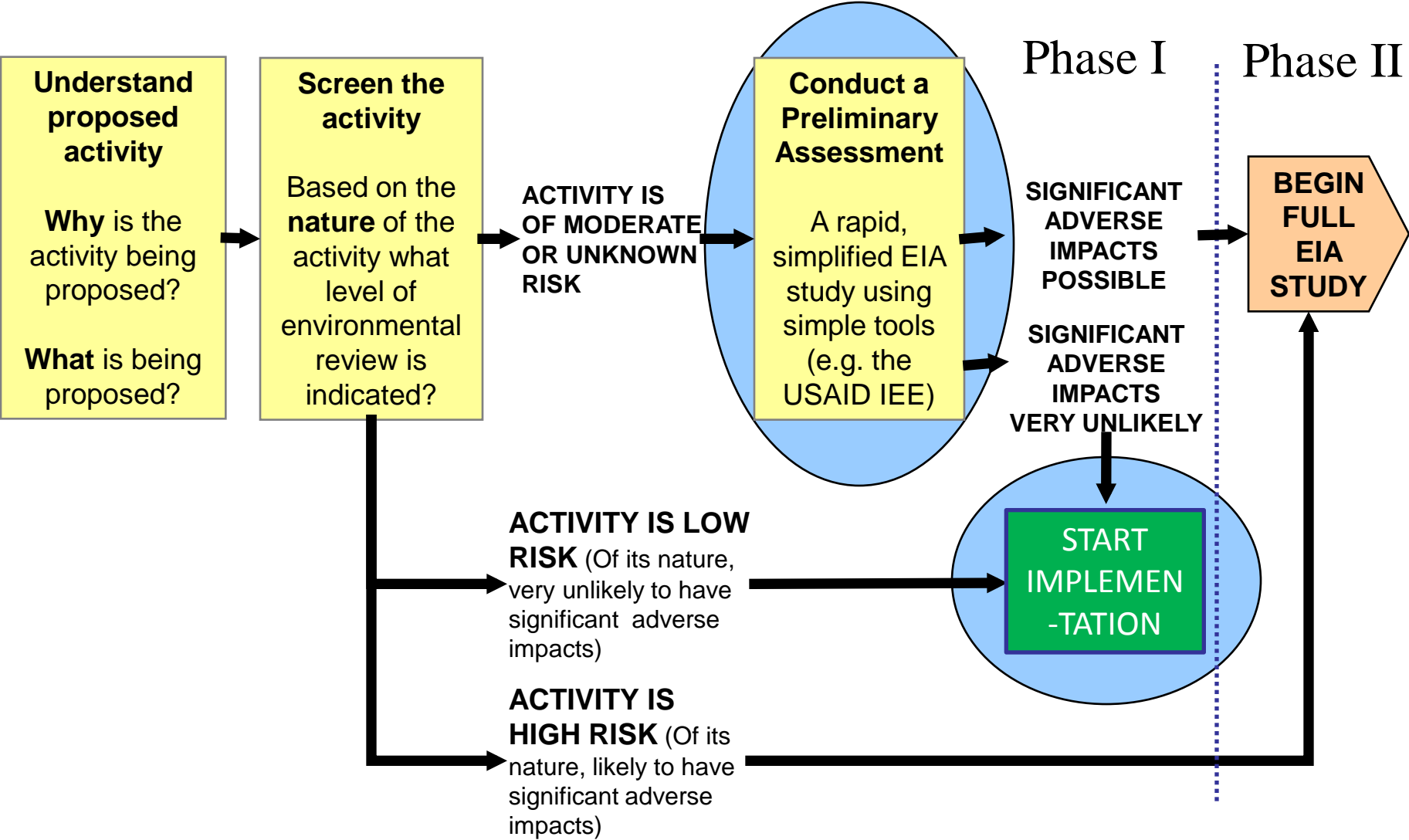
**Moderate-risk activities  
include. . .**

**Small-scale  
infrastructure with  
known potential to cause  
environmental harm**

**Field agricultural  
experimentation of  
MORE than 4 ha.**

**!** **This list is not  
exhaustive!**

# After screening, what next?





# 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. 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?**

# ERR Findings

For **EACH**:

- Moderate/unknown risk activity
- Very high risk activity

The IP recommends one of 3 findings:

## ERR 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

## B. Activities, screening results, and findings

Proposed activities (Provide DESCRIPTIVE listing. Continue on additional page if necessary)	Screening result (Step 3 of instructions)			Findings (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities ONLY)		
	Very Low Risk	High-Risk*	Moderate or unknown risk*	significant adverse impacts are very unlikely	With specified mitigation, significant adverse impacts are very unlikely	Significant Adverse impacts are possible
1.						
2.						
3.						



# What about the signed certification?

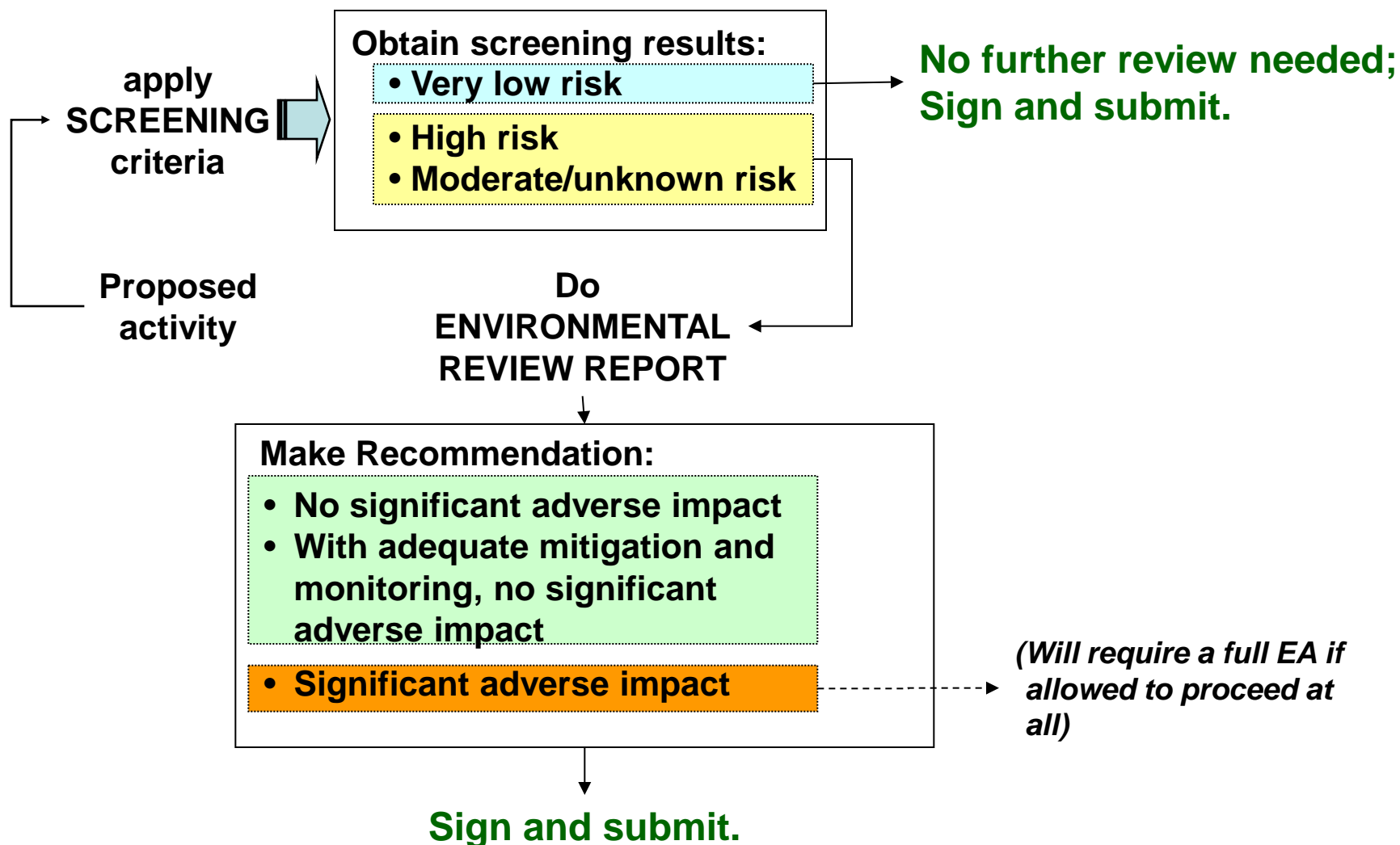
The certification:

- **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?	
C/AOTR	Always
MEO	
REA	
BEO	if any screening results are “high risk”* or if there are any findings of “significant adverse impacts possible”*

\*should be very rare

# 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

to reflect specific sub-project activities, and specific local environmental issues.

**3**

## Don't use the ERF at all!

Project-specific checklists and other approaches are possible.

**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 4<sup>th</sup> 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.