

Session 7. Effective IEEs.

(1:45)

Objective

Initial Environmental Examinations (IEEs) are USAID's version of the preliminary assessment and the most common type of Reg. 216 documentation.

Understand the basic structure of an IEE and the characteristics of well-written, well-considered IEEs by critiquing draft IEEs based on the field visits.

Format

Discussion & Instructions (0:30)

Group Work (1:15)

Background/Review

A well-considered, well-written IEE is the basis of good mitigation and monitoring and the foundation of sound environmental management (and compliance) during activity implementation.

The responsibility for assuring that good-quality environmental documentation is developed lies with team leaders, A/CORs, and activity managers—this is true even when a 3rd-party contractor or the implementing partner develops the IEE.

Again, **Reg. 216 documentation is developed by Mission staff, Partners or contractors**, depending on the situation:

- Most IEEs that cover a Mission's sector portfolio (sector- or DO-level IEEs) are developed by Mission staff or 3rd-party contractors.
- Partners are often asked to develop Reg. 216 documentation for new project components.
- 3rd-party contractors are almost always engaged to undertake EAs.

But when the IEE is approved, USAID takes ownership for the content---no matter who wrote it.

In the Mission, the MEO should serve key roles as (1) a resource for Reg. 216 documentation development; (2) reviewer/gatekeeper for this documentation.

Summary

In this session, we discuss the characteristics of effective IEEs. BEOs and REAs offer their perspectives on common IEE gaps and shortfalls they encounter as IEE reviewers, followed by a moderated discussion..

Following this discussion, we introduce, review and provide feedback on AFR's draft updated template for complex IEEs. The template:

- Reflects the alternative outline that has been used for a number of DO-level and sector-portfolio IEEs over the past several years.
- Spells out the criteria against which BEOs and REAs review IEEs

- Contains significant additional guidance and expectations regarding the content of each section, including how GCC issues are to be addressed.
- Attempts to reduce redundancy and increase clarity, including by placing activity descriptions, impact evaluation, and recommended determinations in close proximity.

Characteristics of effective IEEs/IEE Review Criteria. IEEs are reviewed against the following criteria:

1. Conformity with required IEE content, as per this annotated IEE template and the AFR template for simpler IEEs. (Alternate IEE structures that provide the same information and present a logical flow of analysis may be acceptable.)
2. Conformity with 22 CFR 216 & ADS implementing provisions.
3. Conformity with current sectoral environmental good practice (including, but not limited to, the *USAID Sector Environmental Guidelines* at www.usaidgems.org/sectorGuidelines.htm).
4. Conformity with current AFR expectations regarding (a) treatment of complex and/or consequential activities such as potable water supply, and (2) general implementation conditions such as EMMPs.
5. Clarity, integrity and sufficiency of the analysis presented, and on that basis, the appropriateness of the recommended determinations and conditions/mitigation measures. IEEs must:
 - a. Address the full scope of proposed activities
 - b. Characterize the aspects of the baseline situation critical to evaluating the significance of impacts
 - c. Identify and adequately evaluate key potential impacts.
 - d. Set out mitigation measures that are (1) adequate and (2) *within the scope of USAID's reasonable authority*. (For example, we cannot impose conditions on actors over whom USAID has no control.)
 - e. Make recommended determinations that are reasonable, defensible and in accordance with Reg. 216.
 - f. Use clear, uncluttered language and parallel organization in the presentation of activities, analysis of impacts, and recommended determinations.

Instructions for Review & Feedback on the DRAFT updated “Annotated AFR Template for Complex IEEs”

We will brief the overall outline and the key guidance it contains in plenary.

We will break into small groups and, individually, each take 15-20 minutes to review the outline.

Facilitators will guide the small groups to identify and synthesize key feedback, which will be briefly reported back in plenary and taken on-board to further revise the template.

Note that an abridged IEE using this format is provided in this section of the sourcebook.