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USAID Environmental Procedures for Sub-Projects

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

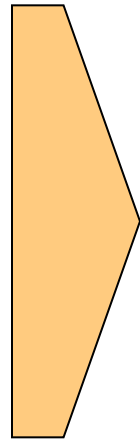


What are sub-projects?

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

Understand the proposed activity

Why is the activity being proposed?

What is being proposed?

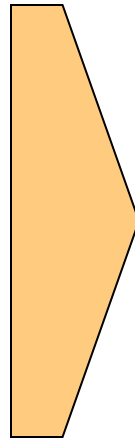
Screen the activity

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*

What is a “simplified environmental review process”



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

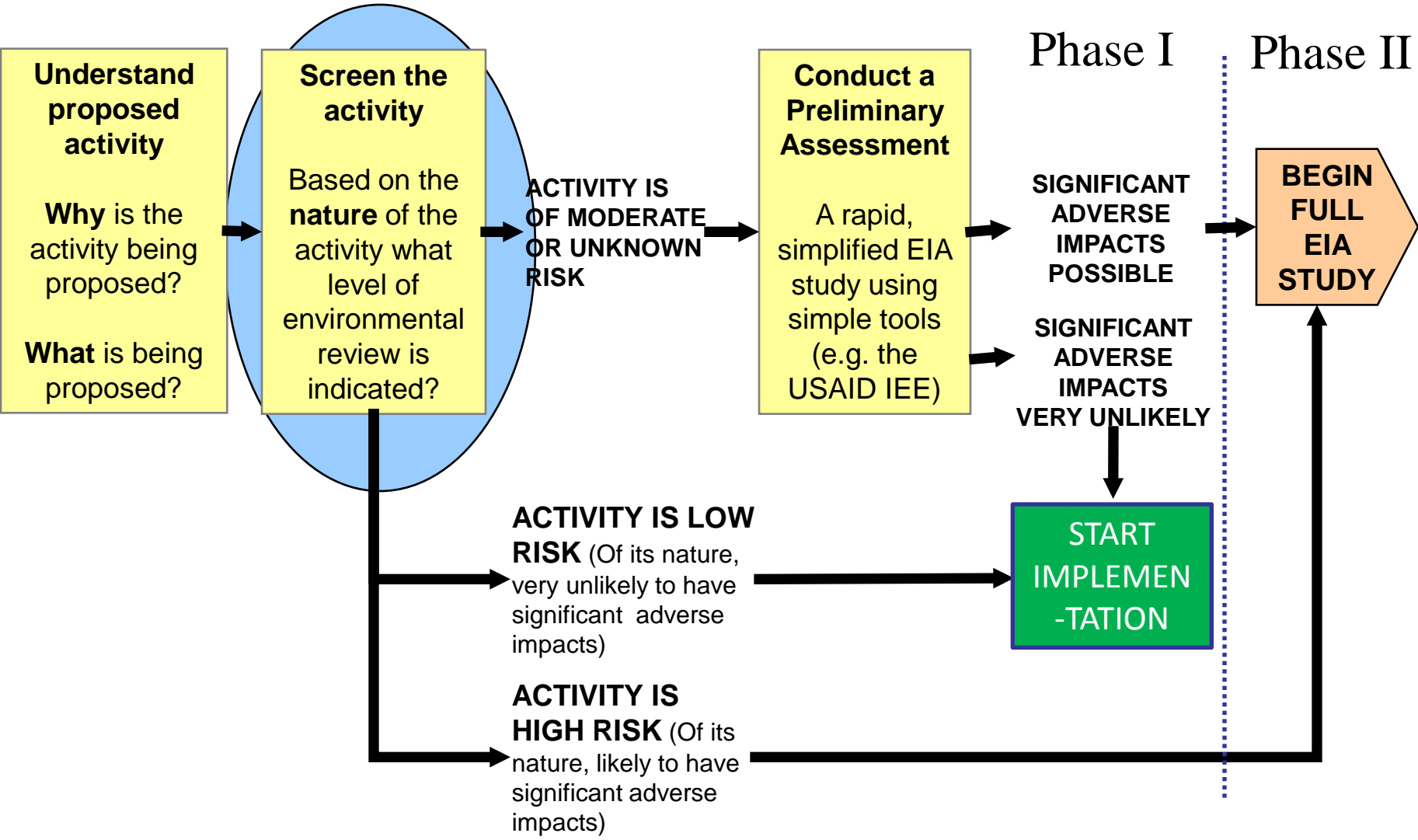
The ERF is usually completed by the IP or their subgrantee.

ERF is being updated—included in sourcebook

Getting started with the ERF

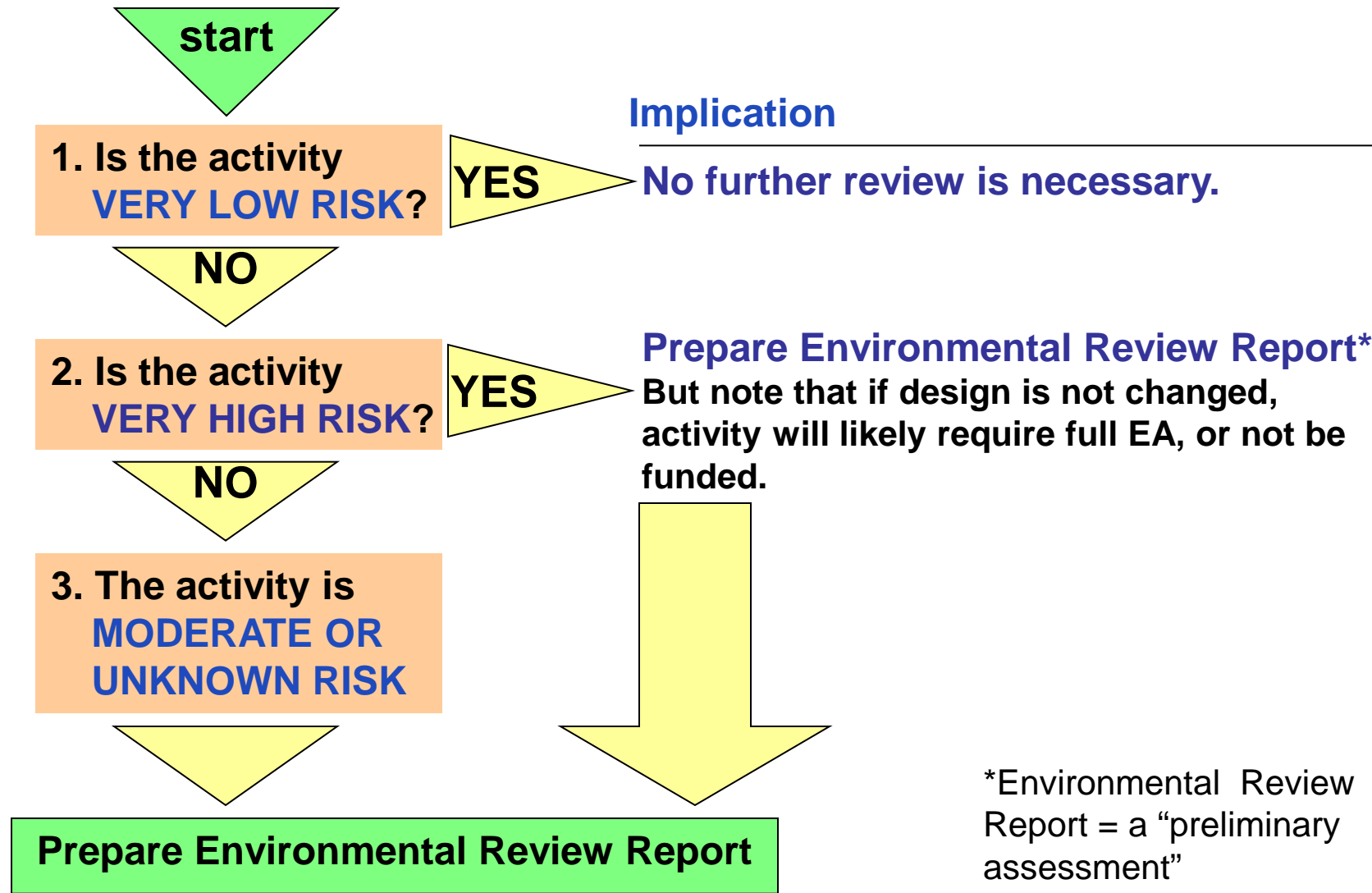
**Sub-project review
starts the same way
that all EIA processes
start. . .**

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





Screening under sub-project procedures



*Environmental Review Report = a “preliminary assessment”



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.						

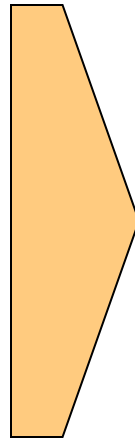
What is an activity?



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. . .
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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

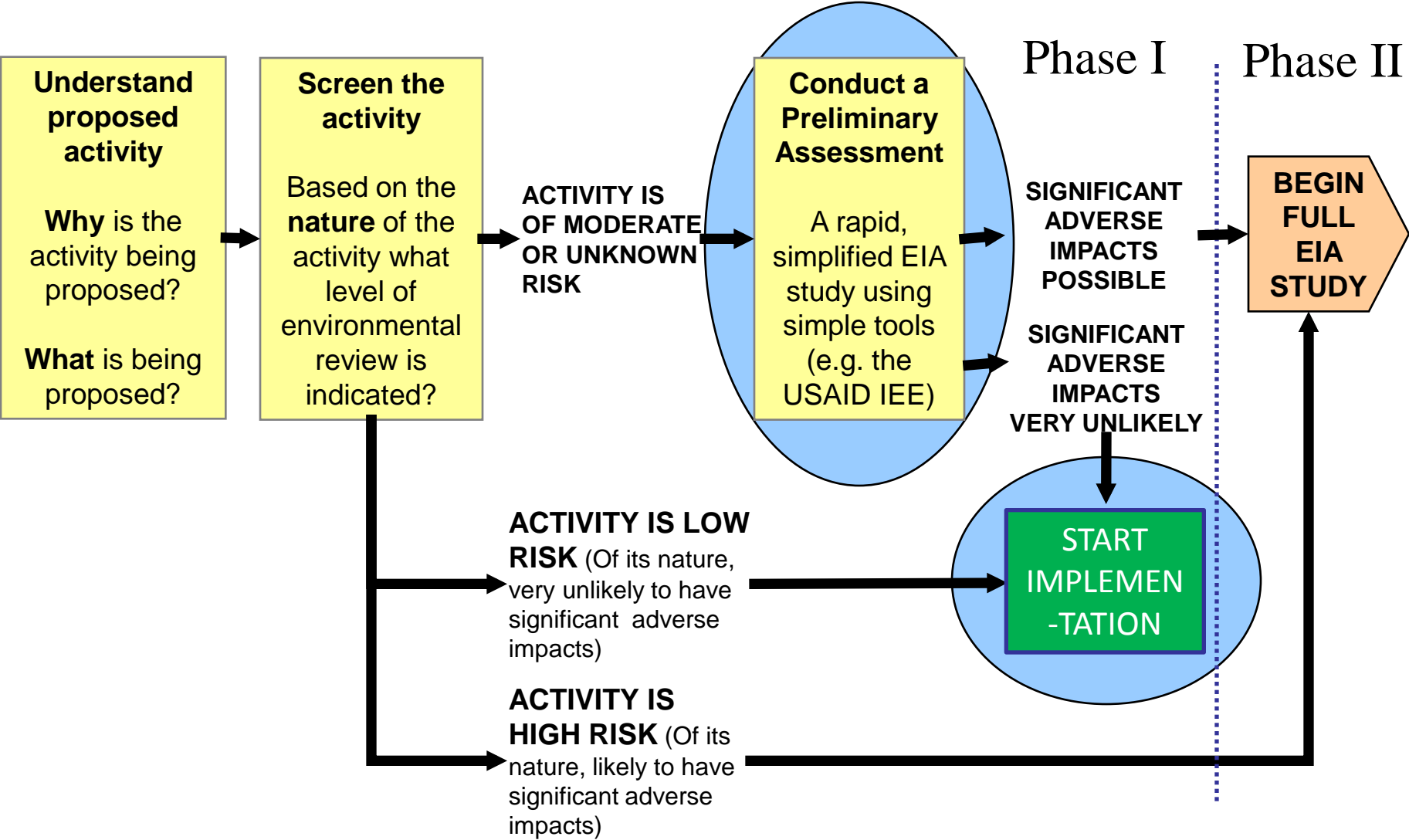
**Moderate-risk activities
include. . .**

**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?

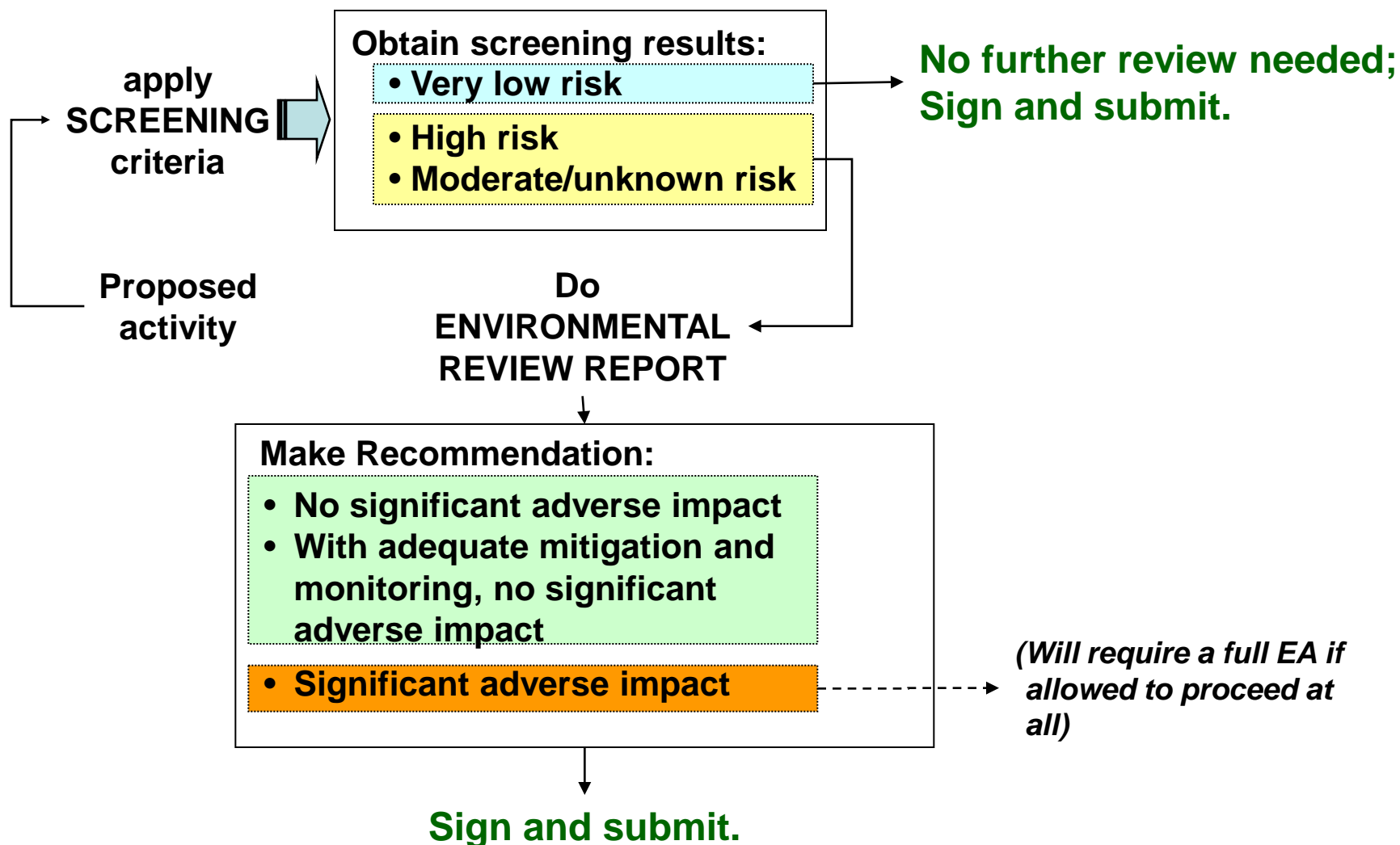
The certification:

- **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 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.