

Standard IEE Language Establishing a Water Quality Assurance Plan (WQAP) Requirement — (Draft)

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Purpose of this Language: Per 22 CFR 216, Initial Environmental Examinations (IEE) must identify and assess the reasonably foreseeable impacts of a specific action or set of actions on the environment. In this context, “environment” includes human health.

IEEs prepared for projects or activities that entail the provision of drinking water must therefore address the risks of water contamination and consequent health impacts. The IEE also must specify conditions (actions) to mitigate these risks—that is, to assure the water provided is safe to drink. Any IEE conditions become required elements of activity implementation.

To best achieve these ends, Africa Bureau requires that IEEs for drinking water activities stipulate preparation of a Water Quality Assurance Plan (WQAP). The WQAP enables USAID and its partners to specify a detailed approach to assuring water quality. The requirement for a WQAP is established in the IEE (and thus prior to implementation). The WQAP itself is developed during project implementation—but before active drinking water activities begin. This allows the WQAP to be developed in a consultative, project-specific process once funding is in place and the interventions better defined.

The recommended IEE conditions language that follows: (1) establishes the requirement for a WQAP; (2) defines the requisite elements of the WQAP; and (3) establishes the process by which the WQAP shall be developed, approved, and implemented.

This language can be adapted or revised as appropriate based on the nature of the proposed activity/activities.

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- Prior to drinking water provision, the project will prepare and receive approval for a Water Quality Assurance Plan (WQAP). The WQAP will be prepared in consultation with the cognizant AOR/COR and/or Activity Manager. Its purpose is to ensure that all new and rehabilitated USAID-funded sources of drinking water provide water that is safe for human consumption. The completed WQAP must be approved by: the AOR/COR and/or Activity Manager; the MEO; and the REA.
 - Once approved, the WQAP must be implemented in full, and for the duration of drinking water activities.¹ Implementation must include testing of water prior to making the supply point available to beneficiaries.
 - The WQAP constitutes a key element of the project’s EMMP. As with all other elements of the EMMP, project budgets, workplans, and staffing plans must provide for its full implementation. The approved WQAP must include at minimum the following sections:
 - Project information (name of project, name of IP, period of performance, contact information, name of COR/AOR)

¹ See Question 1 on following page.

- A description of the drinking water points to be subject to the WQAP (approximate numbers, water source(s), technology(ies), general geographic area and installation context).
 - An inventory of applicable water quality standards, including those promulgated by USAID, as well as the cognizant host-country regulatory entity/entities. (The World Health Organization [WHO] *Guidelines for Drinking-water Quality* may be substituted for host-country standards that are not accessible, unclear or outdated.)
 - The responsible parties/entities/institutions, under host country law or policy, for monitoring and managing water quality of the water points subject to this WQAP. If other than the IP, a summary assessment of their capacity and their involvement.
 - A technical assessment of the equipment, resources and expertise that will be required to monitor and report on compliance with applicable water quality standards. This should include, for example, sampling materials, reagents, transportation, storage, laboratory facilities and capacity, communications, training or certification criteria, etc.
 - Protocol for initial testing and ongoing monitoring of water quality, to include:
 - contaminants for which initial testing and ongoing monitoring will be conducted²
 - water quality assessment methods, including test type and frequency
 - data management and reporting; the project must maintain a central registry of monitoring results by water point and date; GPS coordinates for water points are expected
 - designation of ‘responsible party’ for each aspect of protocol
 - response procedures in the event water does not meet water quality standards
 - Justification for NOT testing to any applicable standard
 - Sustainability strategy to the extent that responsibility for longer-term water quality assurance will transition in part or whole to project partners or beneficiaries. A summary assessment of the capacity of these partners, and any capacity building to be undertaken
- The WQAP should follow any applicable USAID guidance, as well as local laws, regulations and policies.
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Questions for consideration by mini-session participants:

1. Should USAID incorporate a minimum coverage period for any given water point (e.g., 6 months? 1 year?) even if beyond end of subject project? For water points installed or rehabilitated at or near the end of a project period of performance, this could constitute an obligation that the mission would need to address (this is already the case for USG-mandated Arsenic [As] testing).
2. Should USAID/AFR consider including an (interim) minimum list pending formalization of Agency-wide water quality standards (e.g., “At minimum, this must include fecal coliform, nitrates and arsenic”)?

² See Question 2.