# USAID Environmental Compliance and Climate Strategy

**USAID Jordan Implementing Partners**

**December 8, 2022**

# **Ice Breaker -** Show of hands

- Are you:
  - New to environmental safeguards?
  - Somewhat of an expert?
  - Feel you should be up front leading this course from the Jordan perspective

- Are you:
  - Here because your boss made you come?
  - Here because your AOR/COR asked you to be?
  - Excited to be here?
  - Hoping to win one of these cool water bottles?

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# USAID/Jordan and ME Bureau Environmental Team

**Haithem Ali – Mission Environmental Officer (MEO)**

**Farid Musmar – Climate Integration Lead (CIL) and deputy MEO**

**Jeff Ploetz** – Bureau Environmental Officer (BEO)

**Chris Frey** – Regional Environmental Advisor (REA)

**Alona Bachi** – ME Climate Lead

# Topics Covered

- Federal regulation 22 CFR 216 -- life-of-project environmental compliance procedures
- Environmental Mitigation and Monitoring
- USAID Approach to Climate Change
- Additional guidance, training, resources
- Activity Specific Q&A

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# ENVIRONMENTAL SAFEGUARDING


0:00 / 1:55


# WHY ENVIRONMENTAL COMPLIANCE MATTERS & THE PARTNER'S ROLE

USAID IMPLEMENTING PARTNER TRAINING SERIES

# WHAT IS ENVIRONMENT?

- Is it a specific place? A way of life? A social norm or custom? Our history?
- Don’t limit the definition … Environment = Physical, Social, Historical, Economic. What else?
- **An expansive view enables** us to better understand (and assess) interactions with our surroundings.
- USAID takes such an expansive view, which aligns with U.S. NEPA law.

PHOTO CREDIT: SATYAM JOSHI/USAID

# SAFEGUARDING THE ENVIRONMENT

- USAID needs process and criteria to define and apply safeguards, and to ensure they work
  - The Agency's environmental compliance framework (or "Agency Env. Procedures")
- Safeguards at USAID are rooted in specific legal requirements (which we'll cover in more detail)
- Safeguards protect project beneficiaries, and preserve USAID's good name and reputation
- Even more importantly, from a development perspective …

PHOTO CREDIT: MR. AHMAD SALARZAI

# ENVIRONMENTAL COMPLIANCE & SAFEGUARDS IMPROVE PROJECT PERFORMANCE

- Safeguards keep our projects performing well and support our success as development professionals
- Environmental Compliance framework and specific safeguards are vital to—and required elements of—implementation of USAID programs and activities.
- Environmental failure = project failure

PHOTO CREDIT: UNITED NATIONS MILLENNIUM DEVELOPMENT GOALS (MDGS)

# Core concept:

## The Goal is Environmentally Sound Design and Management

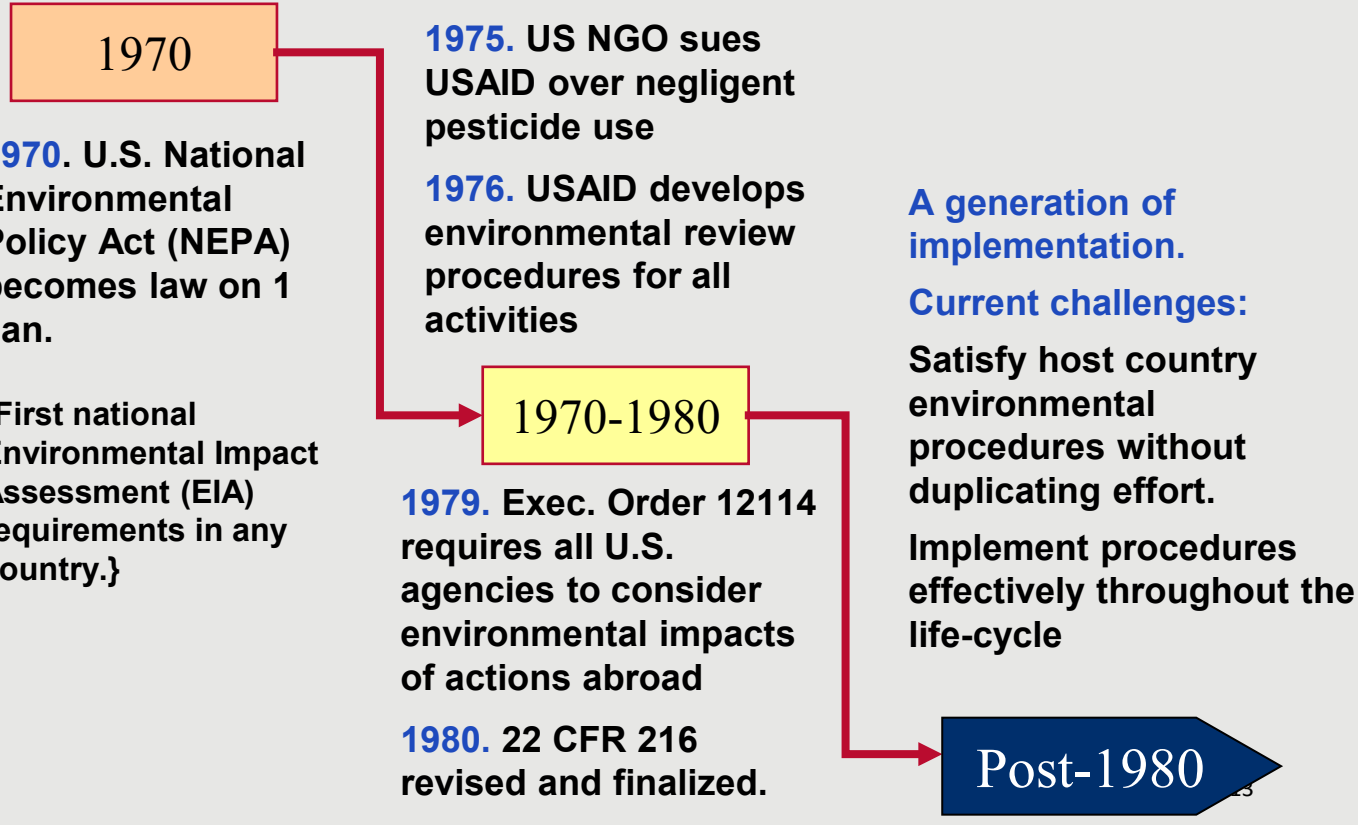
**Environmental Compliance is NOT just paperwork;**

It is a framework to assure that:

- Environmental and social risks are minimized (i.e., prevention)
- Projects are designed to maximize economic, social, and environmental benefits via application of best practices


# USAID REGULATORY COMPLIANCE OVERVIEW

# USAID Environmental Compliance Requirements "Reg 216" Origin and Timeline



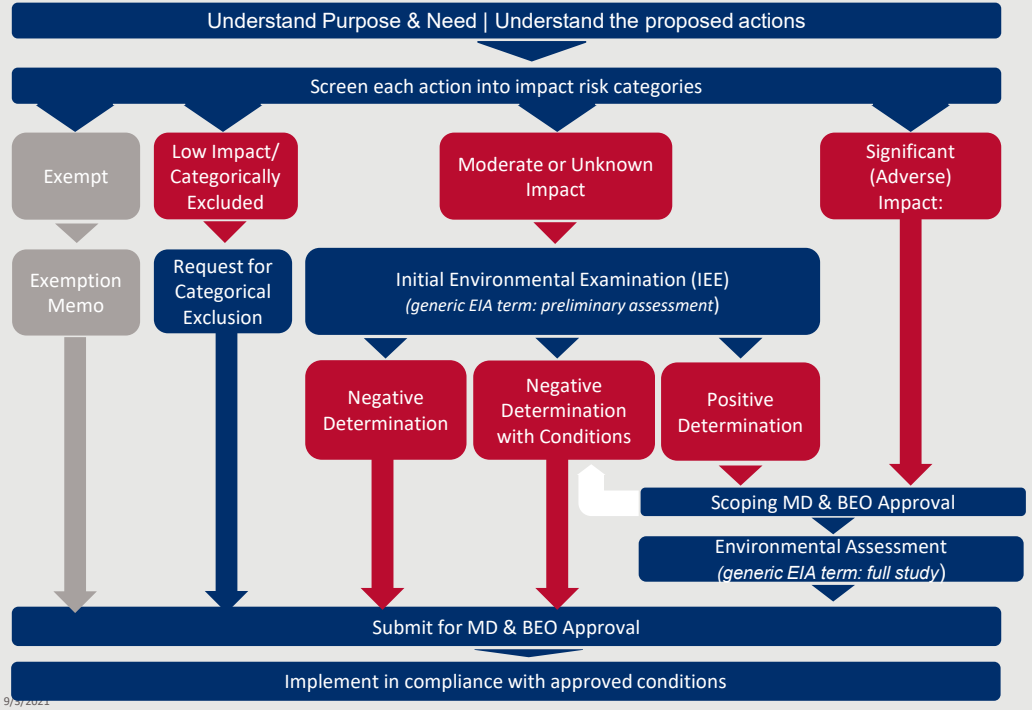
# USAID Environmental Requirements

- 22 CFR 216 codifies USAID's procedures for environmental screening and assessment of our programs
- Applies to every program, project, activity, and amendment supported with USAID funds
  - **Every USAID Officer Who Has a Role in USAID Funded Projects**
  - **Every Partner Who Seeks USAID Funds**
- Compliance with the procedures is mandatory

☞ADS Chapter 204 Environmental Procedures

This chapter provides policy directives and required procedures on how to apply 22 CFR 216

# 22 CFR 216 PROCESS – OVERVIEW



# The Reg 216 Process Simplified

- Screen for Risk
- Assess Risk
- Manage Risk
  - Avoid, Accept, or Mitigate

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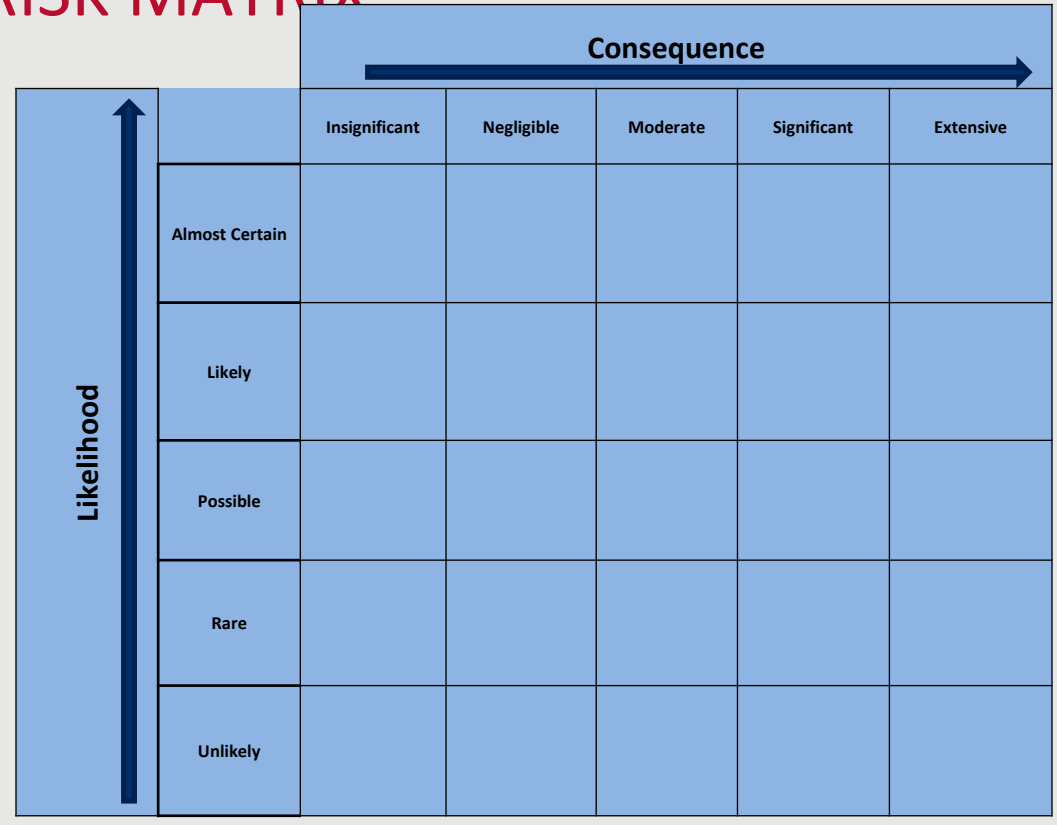
REPEAT

➢ Result: Improved Outcomes

# Environmental Screening

# SIMPLE RISK MATRIX



# SIMPLE RISK MATRIX

| Likelihood | Consequence | | | | |
|---|---|---|---|---|---|
| | Insignificant | Negligible | Moderate | Significant | Extensive |
| Almost Certain | Moderate | High | High | Very High | Very High |
| Likely | Low | Moderate | High | High | Very High |
| Possible | Low | Low | Moderate | High | High |
| Rare | Very Low | Low | Low | Moderate | High |
| Unlikely | Very Low | Very Low | Low | Low | Moderate |

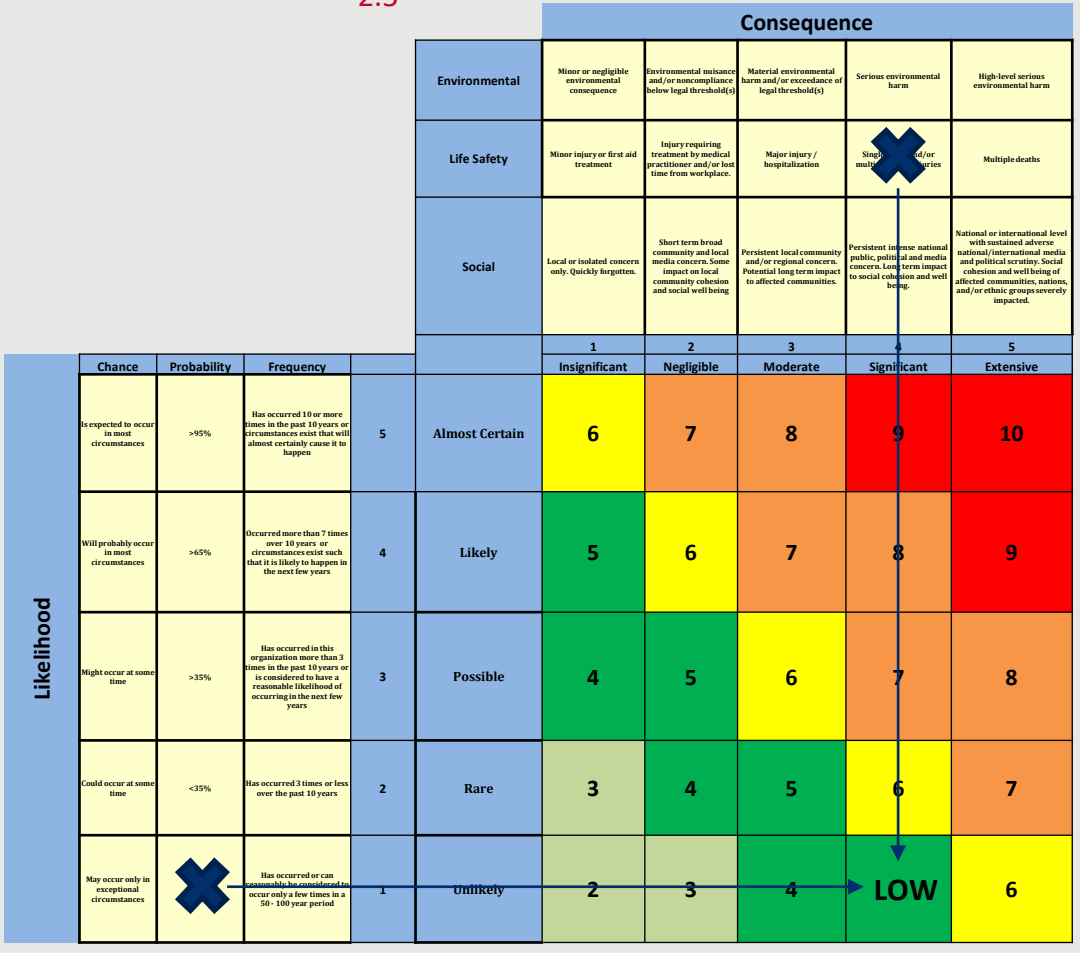
# ENVIRONMENTAL RISK SCREENING AND RANKING

| | | | | Consequence | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | Minor consequence | Environmental nuisance and/or noncompliance below legal threshold(s) | Material environmental harm and/or exceedance of legal threshold(s) | Serious environmental harm | High-level serious environmental harm |
| | | | | 1 | 2 | 3 | 4 | 5 |
| | | | | Insignificant | Negligible | Moderate | Significant | Extensive |
| Likelihood | Once a month or more often | 5 | Almost Certain | 6 | 7 | 8 | 9 | 10 |
| | Once a year or more often | 4 | Likely | 5 | 6 | 7 | 8 | 9 |
| | Once in ten years or more often | 3 | Possible | 4 | 5 | 6 | 7 | 8 |
| | Once in 100 years or more often | 2 | Rare | 3 | 4 | 5 | 6 | 7 |
| | Less often than once in 100 years | 1 | Unlikely | 2 | 3 | 4 | 5 | 6 |

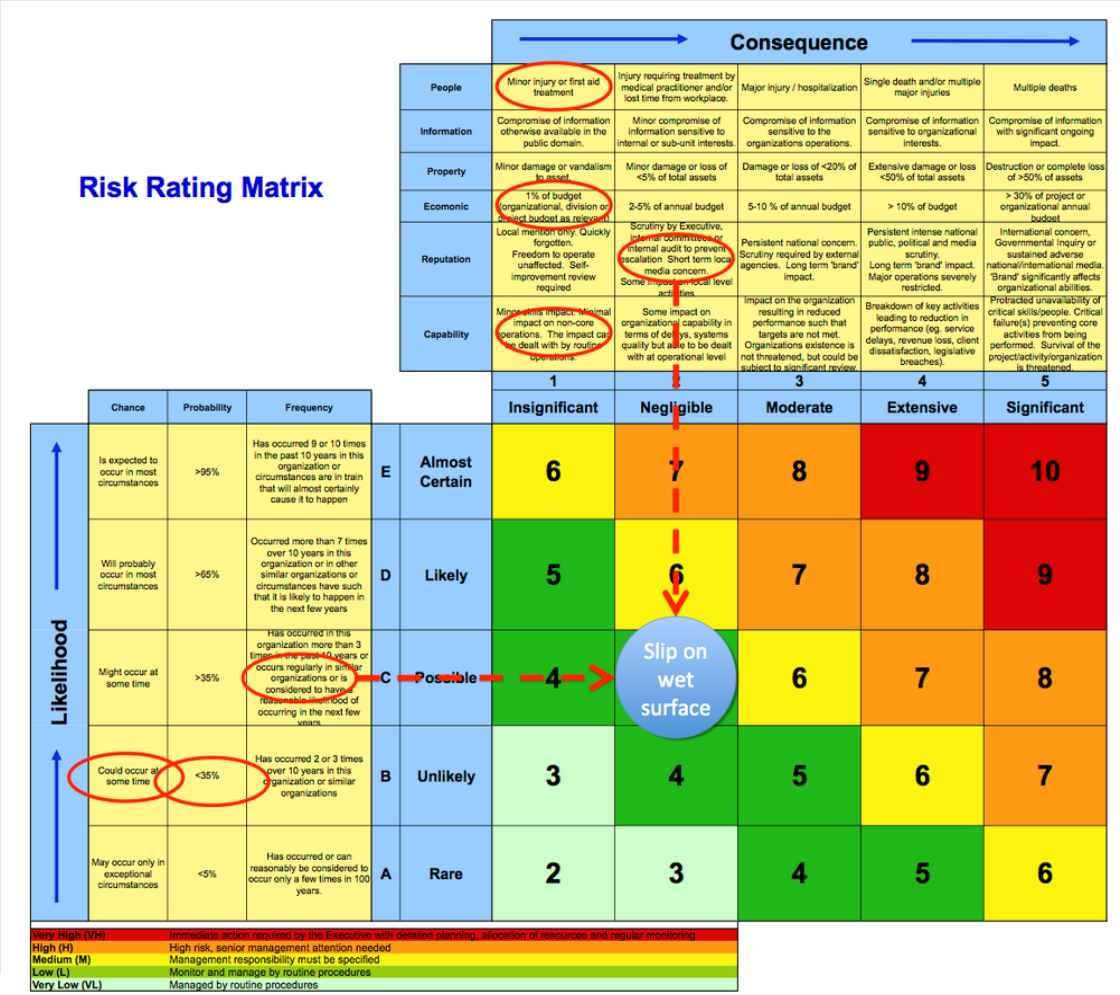
# MULTI-FACTOR RISK SCREENING

| | | | | | Consequence | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | | Environmental | Minor or negligible environmental consequence | Environmental nuisance and/or noncompliance below legal threshold(s) | Material environmental harm and/or exceedance of legal threshold(s) | Serious environmental harm | High-level serious environmental harm |
| | | | | Life Safety | Minor injury or first aid treatment | Injury requiring treatment by medical practitioner and/or lost time from workplace. | Major injury / hospitalization | Single death and/or multiple major injuries | Multiple deaths |
| | | | | Social | Local or isolated concern only. Quickly forgotten. | Short term broad community and local media concern. Some impact on local community cohesion and social well being | Persistent local community and/or regional concern. Potential long term impact to affected communities. | Persistent intense national public, political and media concern. Long term impact to social cohesion and well being. | National or international level with sustained adverse national/international media and political scrutiny. Social cohesion and well being of affected communities, nations, and/or ethnic groups severely impacted. |
| | | | | | 1 | 2 | 3 | 4 | 5 |
| Likelihood | Chance | Probability | Frequency | | Insignificant | Negligible | Moderate | Significant | Extensive |
| | Is expected to occur in most circumstances | >95% | Has occurred 10 or more times in the past 10 years or circumstances exist that will almost certainly cause it to happen | 5 | Almost Certain | 6 | 7 | 8 | 9 | 10 |
| | Will probably occur in most circumstances | >65% | Occurred more than 7 times over 10 years or circumstances exist such that it is likely to happen in the next few years | 4 | Likely | 5 | 6 | 7 | 8 | 9 |
| | Might occur at some time | >35% | Has occurred in this organization more than 3 times in the past 10 years or is considered to have a reasonable likelihood of occurring in the next few years | 3 | Possible | 4 | 5 | 6 | 7 | 8 |
| | Could occur at some time | <35% | Has occurred 3 times or less over the past 10 years | 2 | Rare | 3 | 4 | 5 | 6 | 7 |
| | May occur only in exceptional circumstances | <5% | Has occurred or can reasonably be considered to occur only a few times in a 50 - 100 year period | 1 | Unlikely | 2 | 3 | 4 | 5 | 6 |

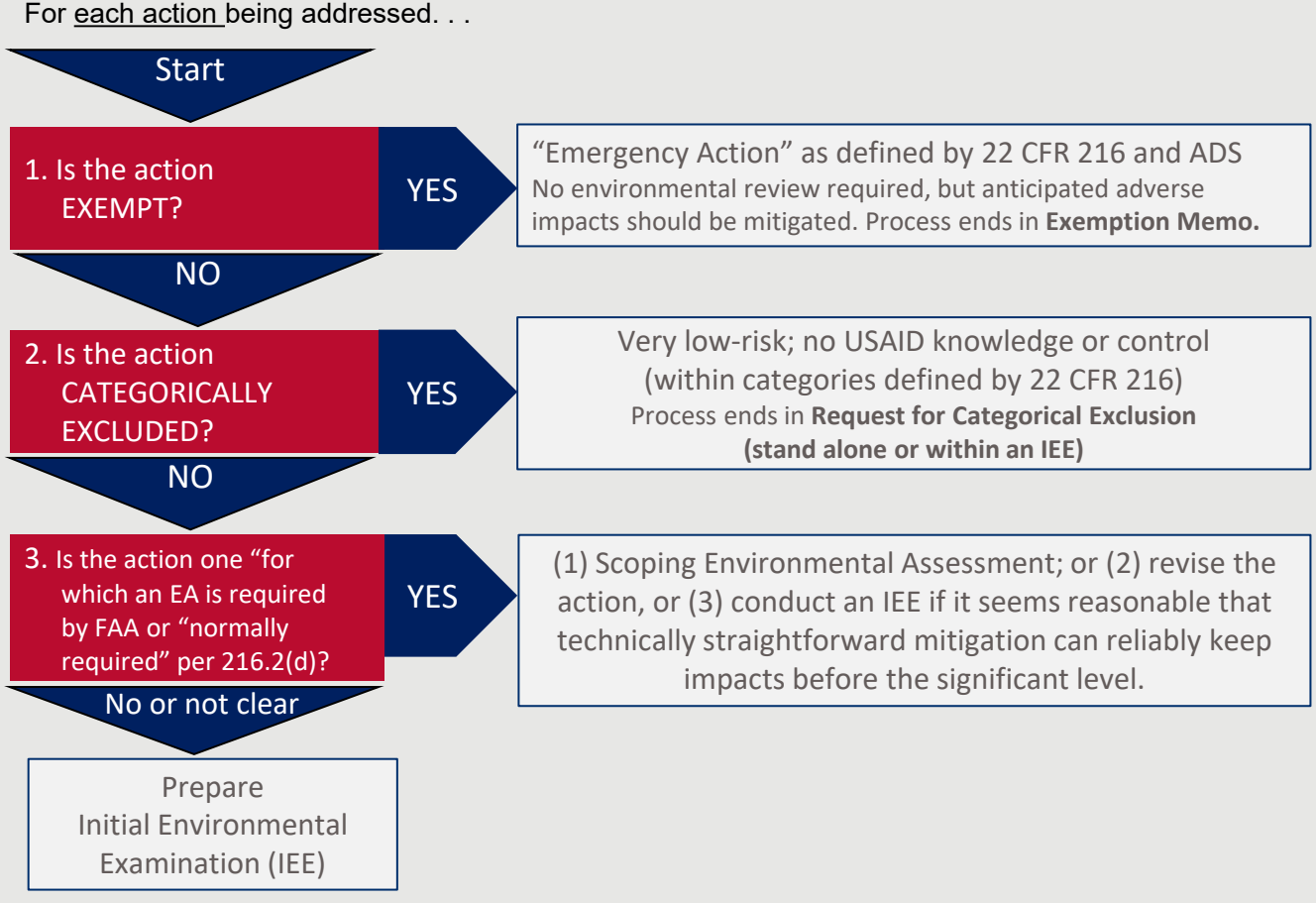
# EXAMPLE: IMPACT OF $PM_{2.5}$ EMISSIONS FROM SMALL INDUSTRY



# EXAMPLE RISK SCREENING AND RANKING



# SCREENING PROCESS UNDER REG 216



## Initial Environmental Examination (IEE):

A simplified EIA study using relatively simple tools that:

- Is normally accomplished by USAID
- Determines whether or not significant adverse impacts are likely ("Threshold Decision")
- Allows the reviewer to agree or disagree with determinations
- Sets out general mitigation and monitoring approach for adverse impacts

**Outline per standard template. . .**

**Facesheet/Summary/Approvals**

1. **Project/Activity Description**
2. **Baseline Environmental Information**
3. **Analysis of Potential Environmental Risk**
4. **Environmental Determinations***
5. **Conditions and Mitigation Measures**
6. **Limitations**
7. **Revisions**

*includes CRM

# IEEs and their determinations

| If the IEE analysis finds. . . | The IEE recommends a… | Implications (if IEE is approved) |
|---|---|---|
| No significant adverse environmental impacts | **NEGATIVE DETERMINATION** | No **conditions**. Go ahead. |
| With specified mitigation and monitoring, no significant environmental impacts | **NEGATIVE DETERMINATION WITH CONDITIONS** | Specified mitigation and monitoring **conditions** must be implemented. (REQUIRED BY ADS) |
| Significant adverse env. impacts are possible | **POSITIVE DETERMINATION** | Initiate scoping statement and, upon approval, full EA. Alternately, redesign activity. **Conditions** imposed by the EA must be implemented. |
| Not enough information to evaluate impacts | **DEFERRAL** | Subject action cannot be implemented until the IEE is amended |
| | | |
| **PLUS, the IEE will address any CATEGORICAL EXCLUSIONS carried over from the screening process.** | | |

For each action addressed, an IEE makes one of 4 recommendations regarding its possible impacts

A **positive determination** triggers a full EIA

**IMPACTS NEED NOT BE DIRECT**.

SIGNIFICANT ADVERSE INDIRECT OR CUMULATIVE IMPACTS WILL TRIGGER A PD.


# Environmental Compliance Documentation

# FOUNDATIONAL USAID PROCEDURES TO SAFEGUARD THE ENVIRONMENT AND PROJECT PERFORMANCE

| ANALYSIS | ACRONYM | PURPOSE |
|---|---|---|
| **Request for Categorical Exclusion (RCE)** | RCE | Documents any proposed projects/activities that belong to classes of actions eligible for categorical exclusions and that have no foreseeable direct or indirect impacts that would preclude them from receiving a categorical exclusion. |
| **Initial Environmental Examination** | IEE | Preliminary review of foreseeable effects on the environment and recommend determinations and conditions for activities. To achieve environmentally-sound activity design and implementation. |
| **Climate Risk Management screening** | CRM | Assesses and evaluates climate-related risks to, and vulnerabilities in, projects and related funding decisions, and allow for activities to be adjusted. |
| **Environmental Mitigation & Monitoring Plan** | EMMP | Translate the IEE conditions into specific and implementable mitigation measures. |

# ADDITIONAL DOCUMENTS

| ANALYSIS | ACRONYM | PURPOSE |
|---|---|---|
| **Environmental Assessments (including Scoping Statement)** | EA | When a Positive Determination is made for some or all of the elements of a project/activity that were further considered in a Scoping Statement, an Environmental Assessment (EA) must be prepared. The purpose of the EA is to support more informed decision making about ways to minimize unintended environmental or human harm as a result of "high-risk" activities. |
| **Pesticide Evaluation Reports Safer Use Action Plan** | PERSUAP | Identifies risks and best practices to avoid harming human health or the environment through the use of pesticides. Authorizes specific use of selected products by IP. |
| **Water Quality Assurance Plan** | WQAP | Ensures safe water quality for drinking water provisioning activities. |

# ENVIRONMENTAL COMPLIANCE AND SAFEGUARDING IS A SHARED RESPONSIBILITY

- Partners and USAID managers (AOR/COR) must work together to assure successful mitigation & monitoring of environmental impacts

## USAID

- Assures approved Reg. 216 documentation in place.
- Establishes/approves environmental mitigation & monitoring conditions.
- Oversees compliance with these conditions, a core part of AOR/COR responsibilities.

## IMPLEMENTING PARTNERS

- Implement environmental management conditions established in Reg. 216 documentation.
- Report on implementation to USAID.

# THE IP ROLE—ESTABLISHED PROCESS & TOOLS IN PLACE

- Partners have access to proven approaches and resources for fulfilling compliance role:
  - USAID Environmental Procedures Hub
  - Sector Environmental Guidelines
  - Training
- Collaboration and shared duties leverage partner skills and expertise
- With partner commitment and engagement safeguards are in place and compliance requirements met

PHOTO CREDIT: PRASHANT SHRESTHA

# IP BEST PRACTICES FOR THE ENVIRONMENTAL COMPLIANCE PROCESS

- Reduce delays in the approval process through clear communication with USAID
  - Start early and plan in advance for developing environmental- and climate-related documents
  - Ensure documents are clear and concise
  - Communicate potential changes to activities to the AOR and MEO
- Budget appropriately for environmental and climate staff to manage environmental safeguarding
- Strive for continual improvement – adaptative management is key

PHOTO BY MOHAMED ABDELWAHAB


# ENVIRONMENTAL MITIGATION AND MONITORING & THE PROJECT EMMP

USAID IMPLEMENTING PARTNER TRAINING SERIES

PHOTO CREDIT: PHOTO CREDIT: ILRI/APOLLO HABTAMU

# WHAT IS ENVIRONMENTAL MITIGATION?

- Types of mitigation:
  - Prevention & Control
  - Compensatory Measures
  - Remediation Measures

Start with this question – what can be done to improve the environmental performance and outcomes of my activity?

# TYPES OF MITIGATION:
## PREVENTION AND CONTROL

- Site selection to avoid erosion, or land use conflicts
- Crops that require less water, or agro-inputs
- Building materials or construction techniques that conserve local resources (timber & sand)
- Vector control that reduces pesticide use
- Use of PPE

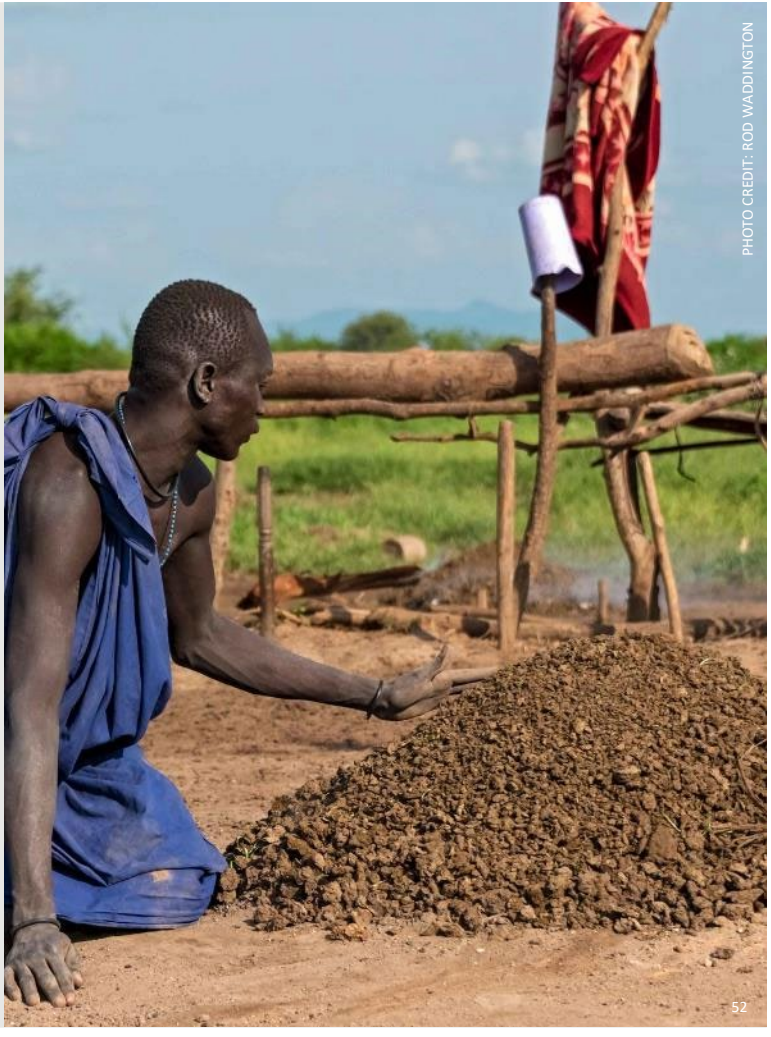


PHOTO CREDIT: ROD WADDINGTON

# TYPES OF MITIGATION: COMPENSATORY MEASURES

- Establishing/re-establishment/rehabilitation of wetlands or forest area
- Tree planting
- Establishing a wildlife corridor
- Carbon offsets

PHOTO CREDIT: VAIZ HA

# TYPES OF MITIGATION: REMEDIATION MEASURES

- Refilling a borrow pit
- Bien Hoa Air Base


PHOTO CREDIT: LISA FERDINANDO, DOD

# SELECTING MITIGATION MEASURES

- Use combination of techniques based on:
  - nature of impact (as defined in the Reg 216 document)
  - when impact occurs through project lifecycle (planning & design, construction, O&M, close-out, etc.).
- Match impacts to specific mitigation measures—use knowledge and experience; use specialist, if needed
- Sector Environmental Guidelines
- Environmental Procedures Hub

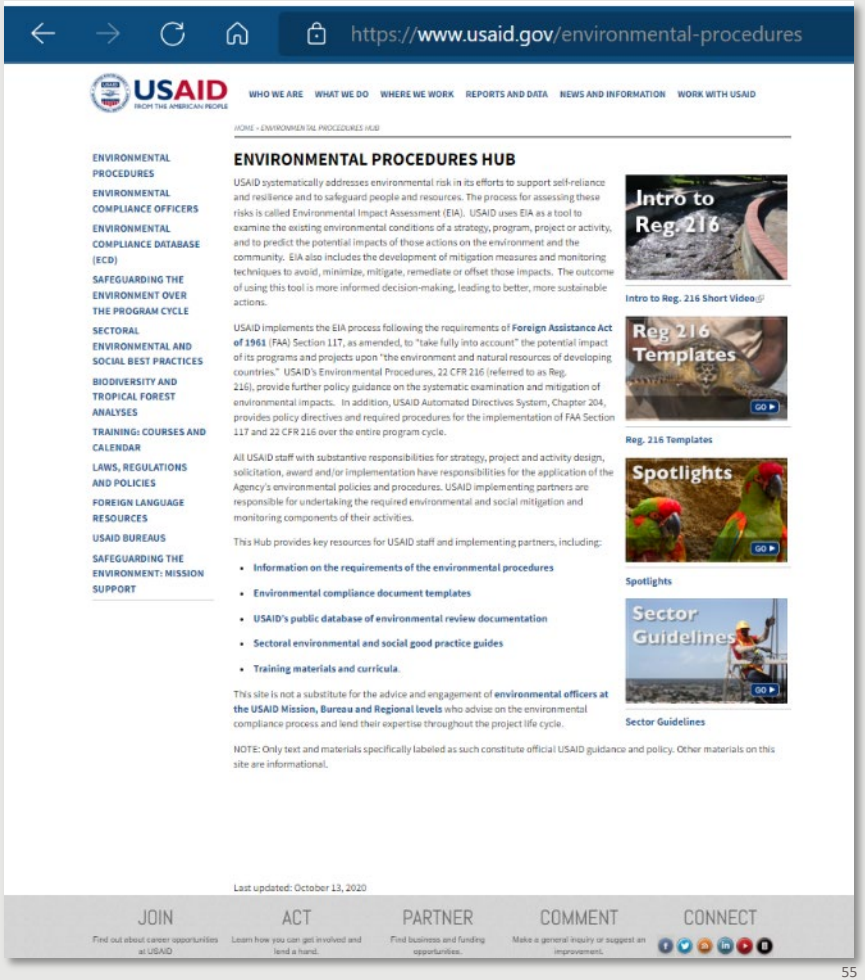


PHOTO BY JERRY BAUER/USAID

# ENVIRONMENTAL COMPLIANCE MONITORING

- Monitoring is a natural complement to mitigation
- Monitoring has two key components:
  - Part 1—determine if required mitigation measures are in place (i.e., they are being implemented)
  - Part II—determine if required mitigation measures are effective (i.e., that impacts are reduced or avoided as expected)

# ROLE OF MONITORING

- Mitigation measures can be in place, but not effective …
  - Farmer training
  - Health Care Waste Management
- Monitoring needs to account for both.

CREDIT: USAID/CAMBODIA HARVEST/FINTRAC INC

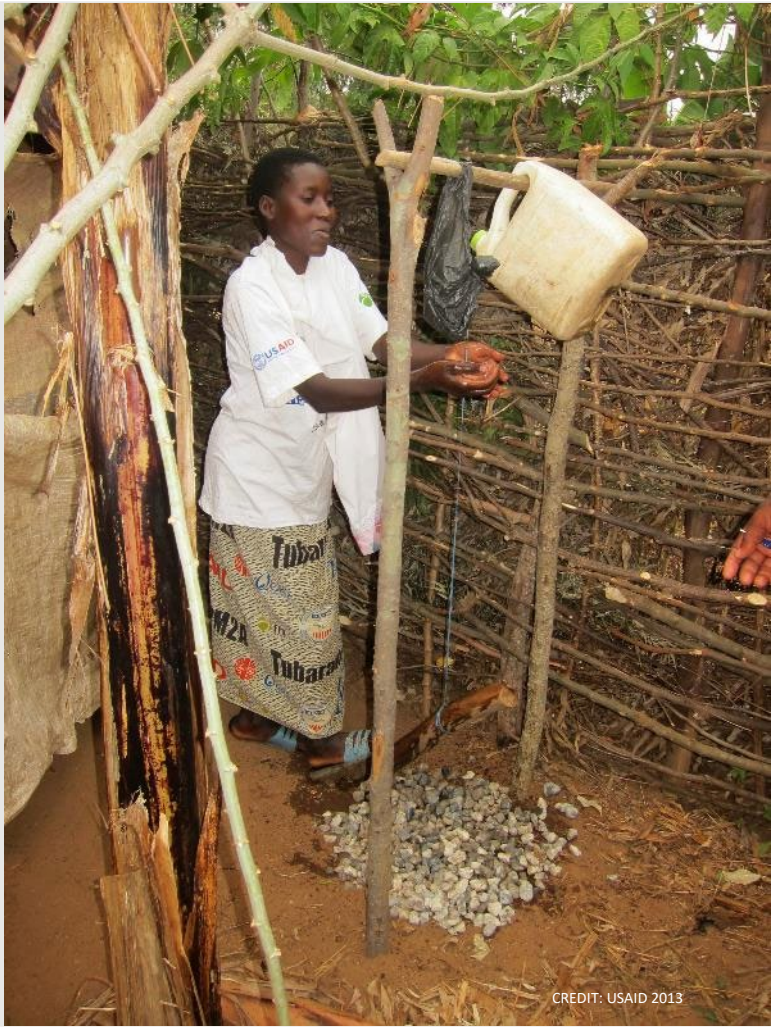
# INDICATORS:
# SIMPLE — COMPLEX

- Indicators are signals—they can tell us how our project is performing environmentally
- We need to select indicators that are accurate, but also affordable and manageable
- Environmental mngt. indicators are not the same as MEL plan indicators

CREDIT: COLBY GOTTERT FOR USAID / DIGITAL DEVELOPMENT COMMUNICATIONS

# INDICATORS REQUIRE SYSTEMATIC MEASUREMENT

- We need to distinguish impacts of our activity from other factors (or the baseline)
- This requires decisions on:
  - Location(s) of measurement
  - Timing of measurement
  - Frequency
  - Use of tools or instruments
  - Special skills or training
- Use ‘before’/’after’-type specifiers or parameters; avoid overly prescriptive or constraining




CREDIT: USAID 2013

# ASSESSING ENVIRONMENTAL INDICATORS SYSTEMATICALLY

## EXAMPLE: WATER QUALITY IMPACTS OF AGRIC. PROCESSING

1. LOCATION - Water samples should be taken at the intake, and downstream of seepage pits.
2. TIMING & FREQUENCY - Samples at different locations should be taken at the same time. Samples should be taken at **high & low flow** during the processing season
3. WHAT ELSE?

# INDICATORS REQUIRE SYSTEMATIC MEASUREMENT

- Selected indicators, regardless of complexity, need to be included in EMMR (more on that in Reporting Session)

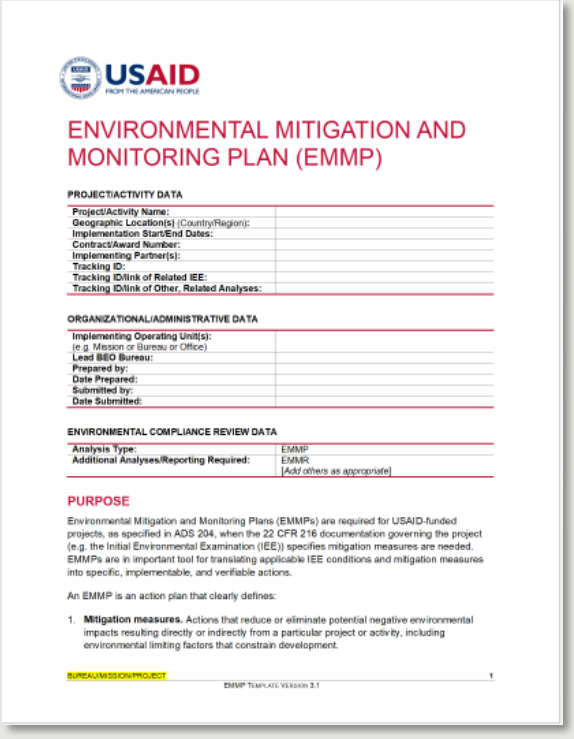
PHOTO CREDIT: USAID / AFGHAN SUSTAINABLE WATER SUPPLY AND SANITATION (SWSS)

# IT IS THE PARTNER'S JOB TO PREPARE THE EMMP

- EMMP is typically prepared concurrent with work planning—it integrates specific elements of project interventions—zones of intervention, beneficiary profiles and capabilities, etc.
- May need to allocate budget
- IP needs to 'own' practicality and sustainability of mitigation measures and monitoring criteria
- The best place to start is a template or form to help organize specific actions.

# HOW TO PREPARE THE EMMP

- Can be as simple, or as nuanced as needed—basic template is flexible and adaptable to meet project needs and fulfill EE (and/or EA) requirements (conditions).
- Typically include fields for:
  - Activity
  - Adverse Impacts
  - Mitigation Measure
  - Monitoring Indicators
  - Monitoring (and Reporting) Schedule – combined EMMP/EMMR template
  - Responsible Parties



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ENVIRONMENTAL MITIGATION AND MONITORING PLAN (EMMP)

**PROJECT/ACTIVITY DATA**

| | |
|---|---|
| **Project/Activity Name:** | |
| **Geographic Location(s)** (Country/Region): | |
| **Implementation Start/End Dates:** | |
| **Contract/Award Number:** | |
| **Implementing Partner(s):** | |
| **Tracking ID:** | |
| **Tracking ID/link of Related IEE:** | |
| **Tracking ID/link of Other, Related Analyses:** | |

**ORGANIZATIONAL/ADMINISTRATIVE DATA**

| | |
|---|---|
| **Implementing Operating Unit(s):** (e.g. Mission or Bureau or Office) | |
| **Lead BEO Bureau:** | |
| **Prepared by:** | |
| **Date Prepared:** | |
| **Submitted by:** | |
| **Date Submitted:** | |

**ENVIRONMENTAL COMPLIANCE REVIEW DATA**

| | |
|---|---|
| **Analysis Type:** | EMMP |
| **Additional Analyses/Reporting Required:** | EMMR<br>*[Add others as appropriate]* |

**PURPOSE**

Environmental Mitigation and Monitoring Plans (EMMPs) are required for USAID-funded projects, as specified in ADS 204, when the 22 CFR 216 documentation governing the project (e.g. the Initial Environmental Examination (IEE)) specifies mitigation measures are needed. EMMPs are an important tool for translating applicable IEE conditions and mitigation measures into specific, implementable, and verifiable actions.

An EMMP is an action plan that clearly defines:

1. **Mitigation measures.** Actions that reduce or eliminate potential negative environmental impacts resulting directly or indirectly from a particular project or activity, including environmental limiting factors that constrain development.

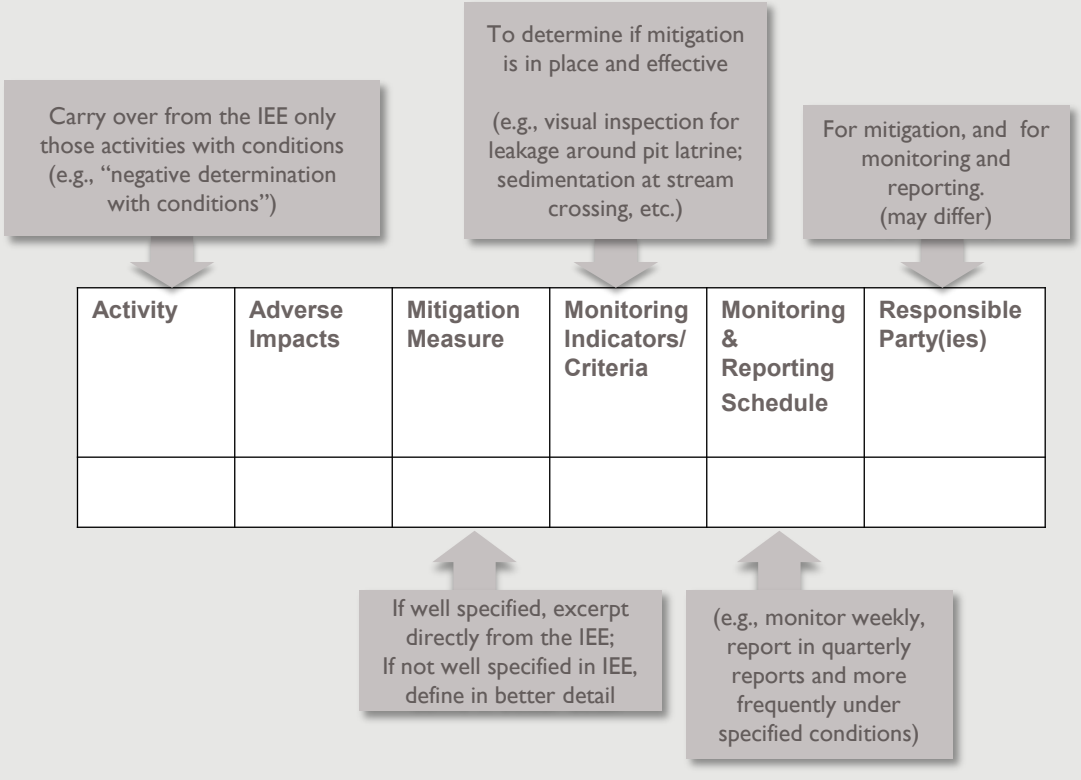
BUREAU/MISSION/PROJECT 1
EMMP TEMPLATE VERSION 3.1

# THE EMMP: USUALLY A SIMPLE TOOL

## Basic EMMP template (see EMMP template provided in training materials)

**AN EMMP SETS OUT:**

- ALL the mitigation measures required by the IEE or EA
- Indicators or criteria for monitoring their implementation & effectiveness
- who is responsible for mitigation and monitoring



# AN EFFECTIVE EMMP IS SPECIFIC + REALISTIC

- The EMMP must specify practical mitigation measures
- The EMMP often "translates" IEE conditions that are written in very general terms
- Implementing these conditions requires first translating them into specific mitigation actions

HOW DO WE DO THIS?

For example, WASH-related IEE conditions might state:

"wells shall be sited to minimize the possibility of contamination."

*Or even more generally:*

"wells shall be sited consistent with good practices."

# EMMPS BUILD ON STANDARDS & BEST PRACTICE

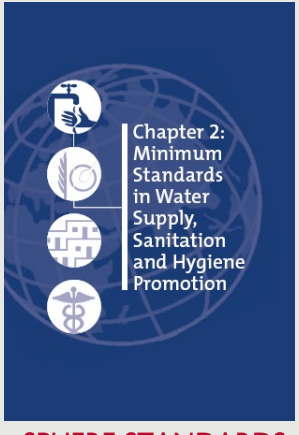
Determining specific mitigation actions starts with review of appropriate standards or best practice guidance

*For our well siting example:*

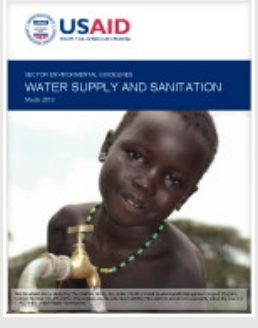
Identify and adopt siting criteria from relevant resources

- The specific mitigation action/ measure in the EMMP is:
  - –"Compliance with project well-siting criteria"—attach this criteria to the EMMP and make a checklist for use by field teams and Monitoring & Evaluation (M&E) staff

HOST-COUNTRY STANDARDS




SPHERE STANDARDS




USAID *SECTOR ENVIRONMENTAL GUIDELINES*

ETC.

# CHOOSING A RESPONSIBLE PARTY

- Prioritize the following criteria based on the mitigation effort to determine the best person/position for the job

# ATTRIBUTES OF STRONG EMMPS

- Clear language
- Each IEE/EA condition is addressed and linked to an impact and mitigation measure
- Specific and realistic
- Builds on standards and best practice

PHOTO CREDIT: SATYAM JOSHI/USAID

# EFFECTIVE MITIGATION & MONITORING

**BE SYSTEMATIC**

**REALISTIC**
M&M must be achievable within time, resources & capabilities.

**TARGETED**
Mitigation measures & indicators must correspond to impacts.

**FUNDED**
Funding for M&M must be adequate over the life of the activity

**CONSIDERED EARLY**

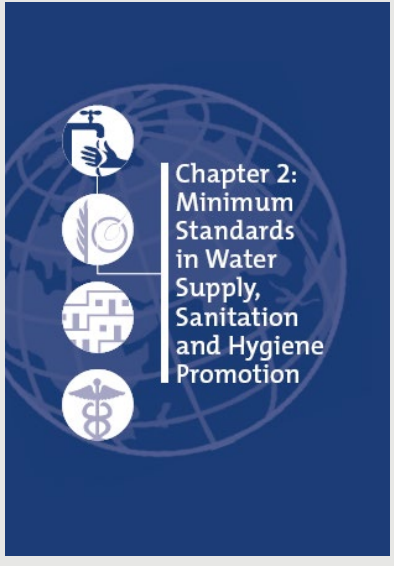
**Preventive mitigation** is usually cheapest and most effective. Prevention must be built in at the design stage.

If M&M budgets are not programmed at the design stage, they are almost always inadequate!

# ATTRIBUTES OF STRONG EMMPS
## WASH EXAMPLE

- Specify siting criteria
- Identify testing parameters & frequency
- Specify testing protocols, technologies
- Address staff or personnel qualifications or certifications
- Adopt or refine best practices

HOST-COUNTRY STANDARDS




SPHERE STANDARDS


USAID *SECTOR ENVIRONMENTAL GUIDELINES*

ETC.

# EMMPS
## WHAT TO AVOID

- Mitigation measures that are not specific to the local context
- Lack of mitigation measures at all stages
- Monitoring timing and frequency that is unreasonable or unattainable.
- Designation of a subcontractor as a responsible party without any project oversight.


PHOTO BY MOLLY BERGEN/WCS, WWF, WRI

# EMMPS
# BUDGETING

- **Tip:** Closely work to integrate the EMMP requirements into the work plan.
    - Work planning is when project activities are typically designed and budgeted.
    - Coordination between project staff responsible for developing the work plan (e.g., COP, DCOP, Component Leads, etc.) and the individual(s) responsible for developing the EMMP is key.
- Inclusion of LOE for any external consultants or home office staff that may assist in the development of the EMMP (e.g., M&E specialist).

# DIFFERENT TYPES OF EMMPS

- Addressing requirements of Activity- vs. Project-level IEE
- Addressing Programmatic IEEs; **need to tailor** or adapt existing template EMMP or EMMP tables prepared with the P-IEE to the specific (sub)activities being implemented–**don't just 'cut and paste.'**
- Include all mitigation and monitoring actions needed to satisfy the underlying IEE/EA conditions, and also that are needed to manage the impacts–make additions where needed.

# EMMP REVIEW AND APPROVAL

- EMMP is usually submitted and approved with the project work plan or PMP
- EMMP must be approved by the project COR or AOR
- Must assure that EMMP is reflected in the workplan and budget
- Sometimes additional review or required clearance by the MEO, REA, or BEO per requirement of the IEE/Environmental Assessment or operating unit policy.


# ENVIRONMENTAL COMPLIANCE REPORTING

## USAID IMPLEMENTING PARTNER TRAINING SERIES

PHOTO CREDIT: SATYAM JOSHI/USAID

# WHAT DOES ENVIRONMENTAL COMPLIANCE REPORTING LOOK LIKE?

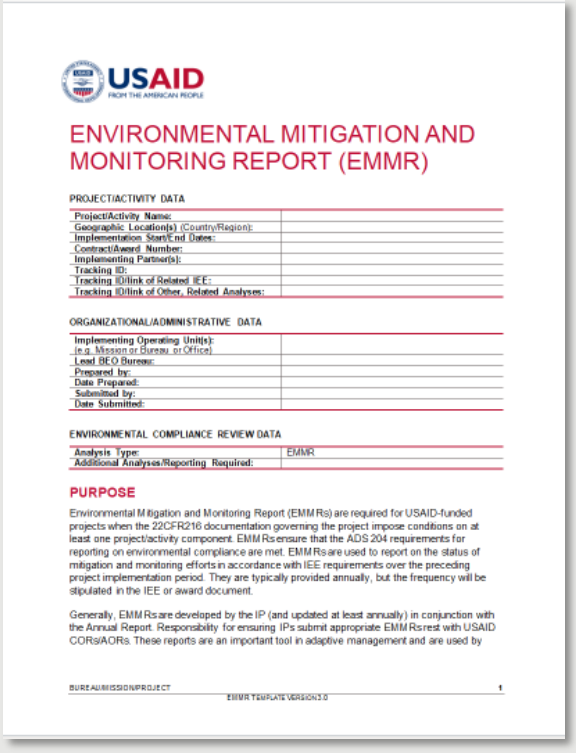
- How does Reporting relate to the EMMP?
  - Importance of record keeping
- Attach the integrated EMMP to the reporting document
- Partners should use the EMMP to streamline and simplify reporting.

# WHAT IS THE ENVIRONMENTAL MITIGATION AND MONITORING REPORT (EMMR)?

- Together, EMMPs and EMMRs help partners fulfill their obligations to conduct effective mitigation and monitoring.
- EMMRs also allow AORs/CORs to monitor compliance of award instruments under their purview

# WHAT IS THE ENVIRONMENTAL MITIGATION AND MONITORING REPORT (EMMR)?

- What is included in the EMMR?
  - Section 1: Project/Activity Summary
  - Section 2: Environmental Compliance Monitoring and Reporting
  - Section 3: Lessons Learned
  - Section 4: EMMR Table
  - Attachments: Pictures, water quality data, waste disposal logs, etc.



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ENVIRONMENTAL MITIGATION AND MONITORING REPORT (EMMR)

PROJECT/ACTIVITY DATA

| | |
|---|---|
| Project/Activity Name: | |
| Geographic Location(s) (Country/Region): | |
| Implementation Start/End Dates: | |
| Contract/Award Number: | |
| Implementing Partner(s): | |
| Tracking ID: | |
| Tracking ID/link of Related IEE: | |
| Tracking ID/link of Other, Related Analyses: | |

ORGANIZATIONAL/ADMINISTRATIVE DATA

| | |
|---|---|
| Implementing Operating Unit(s): (e.g. Mission or Bureau or Office) | |
| Lead BEO Bureau: | |
| Prepared by: | |
| Date Prepared: | |
| Submitted by: | |
| Date Submitted: | |

ENVIRONMENTAL COMPLIANCE REVIEW DATA

| | |
|---|---|
| Analysis Type: | EMMR |
| Additional Analyses/Reporting Required: | |

PURPOSE

Environmental Mitigation and Monitoring Report (EMMRs) are required for USAID-funded projects when the 22CFR216 documentation governing the project impose conditions on at least one project/activity component. EMMRs ensure that the ADS 204 requirements for reporting on environmental compliance are met. EMMRs are used to report on the status of mitigation and monitoring efforts in accordance with IEE requirements over the preceding project implementation period. They are typically provided annually, but the frequency will be stipulated in the IEE or award document.

Generally, EMMRs are developed by the IP (and updated at least annually) in conjunction with the Annual Report. Responsibility for ensuring IPs submit appropriate EMMRs rest with USAID CORs/AORs. These reports are an important tool in adaptive management and are used by

BUREAU/MISSION/PROJECT 1
EMMR TEMPLATE VERSION 3.0

# EMMR TABLE TEMPLATE

| **Project/Activity/Sub-Activity** | **Mitigation Measure(s)** | **Summary Field Monitoring/Issues/Resolution** (i.e. monitoring dates, observations, issues identified and resolved) | **Outstanding Issues, proposed resolutions** |
|---|---|---|---|
| Activity 1: | | | |
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| Activity 2: | | | |
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| Activity 3: | | | |
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| Activity 4: | | | |
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| Activity 5: | | | |
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| Activity 6: | | | |
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| | | | |

# EMMR TABLE EXAMPLE: WASH

| Project/Activity/Sub-Activity | Mitigation Measure(s) | Summary Field Monitoring/Issues/Resolution (i.e. monitoring dates, observations, issues identified and resolved) | Outstanding Issues, proposed resolutions |
|---|---|---|---|
| Activity 1: Improve access to safe drinking water for community members. | | | |
| Installation of a community well. | Calculate yield and extraction rates in relation to current water usage and available supply (P&D). | June 15, 2020: Yield and extraction rates were calculated and concluded that the water supply is able to support current usage/extraction rates. | |
| | Determine if the increased demand will negatively impact water availability (P&D). | June 15, 2020: Additional calculations determine that the water supply can accommodate an addition 300 liters of water extracted a day (for a total of 500 liters), sufficient to support the well. | |
| | Install fencing to keep livestock from grazing uphill of the water supply and from drinking from the water source (C). | July 26, 2020: Fencing has been installed, but there is small area where young livestock have gained access to a grazing area uphill from the water supply. | July 26, 2020: Insufficient fencing found on the northeast perimeter, recommend fixing gap and reinforcement of fence to ensure livestock are unable to breach fence again. |
| | Ensure that water is not over extracted through monitoring extraction rates (C, O&M). | August 1, 2020: Total extraction calculated to be 456 liters.<br>September 2, 2020: Total extraction calculated to be 467 liters.<br>October 1, 2020: Total extraction calculated to be 432 liters. | |
| Activity 2: Improve access to sanitation facilities for community members. | | | |
| Construction of pit latrines for the community center | Site pit latrine at least 30 meters from any water source (P&D). | June 15, 2020: Distance from the site of the pit latrine and the nearest water source is 48.3 meter.<br><br>June 30, 2020: Distance from new site and the nearest water source is 43.9 meters. | |
| | Evaluate the depth to the water table, pit latrines should not be installed where the water table is shallow or where the groundwater is vulnerable to contamination (P&D). | June 15, 2020: Depth to the water table was determined to be too shallow to support a pit latrine. New site is recommended.<br><br>June 26, 2020: New site has a depth to the water table sufficient to support a pit latrine. | |

# TIMING FOR ENVIRONMENTAL COMPLIANCE REPORTING


PHOTO BY MICHIEL TERELLEN/USAID

- Reporting is typically done at multiple times throughout the year.
- Frequency of reporting is stipulated in the IEE and award
- Regular reporting:
  - Integrated into regular reporting using the standard table, including a narrative (brief) should accompany the EMMP in the overall reporting.
  - Photos, maps, sign in sheets etc. may also be included.

# WHEN THERE ARE ISSUES FOUND

- What is a Corrective Action Plan?
  - The course of action to remedy consequential EMMP implementation deficiencies or environmental impacts that were unforeseen by the approved 22 CFR 216 documentation for the activity.
  - Roles in the CAP
    - AOR/COR is the only one that can stop work and give technical direction.
    - IP implements course of action
- OIG Audits
  - Reporting is an area of increased Agency focus

PHOTO: NENA TERRELL, USAID ETHIOPIA

# TIPS FOR SUCCESSFUL ENVIRONMENTAL COMPLIANCE REPORTING

- Include cost of activity environmental compliance monitoring and reporting into overall budget
- Use the EMMP to help streamline reporting
- A picture is worth a thousand words.  Add photos and detailed maps when possible


# CLIMATE RISK MANAGEMENT

# PROJECT/ACTIVITY-LEVEL CRM TABLE

## LOW, MODERATE OR HIGH RISK

### REQUIRED

- Project/Activity element
- Climate Risk
- Climate Risk Rating
- Opportunities
- How are Climate Risks Addressed in the Activity?
- Accepted Climate Risks?

### OPTIONAL

- Timeframe
- Geography
- Adaptive Capacity
- Climate Risk Management Options
- Next Steps for Activity Implementation

| 1.1: Defined or Anticipated Tasks or Interventions* | 1.2: Time-frame | 1.3: Geo-graphy | 2: Climate Risks* | 3: Adaptive Capacity | 4: Climate Risk Rating* | 5: Opportunities* | 6.1: Climate Risk Management Options | 6.2: How Climate Risks are Addressed in the Activity* | 7: Next Steps for Activity Implementation | 8: Accepted Climate Risks* |
|---|---|---|---|---|---|---|---|---|---|---|
| *[List defined or anticipated tasks or interventions]*<br>*Example: Support local water utility sustainability.* | *[List time-frame]*<br>*Example: 0-30 years* | *[List geog. scope]*<br>*Example: Coastal, medium-sized towns.* | *[Enter description of climate risks]*<br>*Example: Lack of raw water to extend water to new customers due to shifting precipitation patterns. Storm surge may damage utility infrastructure in coastal areas.* | *[Enter description of Information Capacity, Social and Institutional Capacity, Human Capacity, and Financial Capacity]*<br>*Example: Existing water supply infrastructure in poor condition. Utilities have moderate access to financing.* | *[Enter rating for each risk: High, Moderate, or Low]*<br>*Example: High* | *[Enter description]*<br>*Example: Consider building to withstand a 500-year flood.* | *[Enter management options for each climate risk]*<br>*Example: Support utility efforts to put in place infiltration wells in catchment areas. Work with utilities to survey infrastructure to fully assess risk in target districts.* | *[Enter selected management options for each climate risk, if relevant]*<br>*Example: Work with utilities to survey infrastructure to fully assess climate risk in target districts.* | *[Enter next steps for addressing risks in activity implementation, if relevant]*<br>*Example: Incorporate climate change assessment into activity solicitation (Solicitation, p. X).* | *[Enter if the risk is accepted and why, if relevant. This is required if 6.2 and 7 do not address this climate risk]*<br>*Example: None.* |

*

# DOCUMENTATION

| | | |
|---|---|---|
| **R/CDCS** |  | Climate Change Annex |
| **Project** |  | RCE/IEE with CRM screening table |
| **Activity** |  | RCE/IEE, possibly award design/documents |

# CLIMATE RISK MANAGEMENT RESOURCES

- **Climate Risk Profiles**
- **Greenhouse Gas Emissions Fact Sheet**
- **Climate Risk Screening & Management Tool**
  - One each for strategy, project, and activity design
- **Sector-specific annexes** to the Climate Risk Screening & Management Tool

Available at:
https://pages.usaid.gov/E3/GCC/climate-risk-management (USAID only)
https://www.climatelinks.org/integration/climate-risk-management/resources (External)

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# USAID Climate Strategy

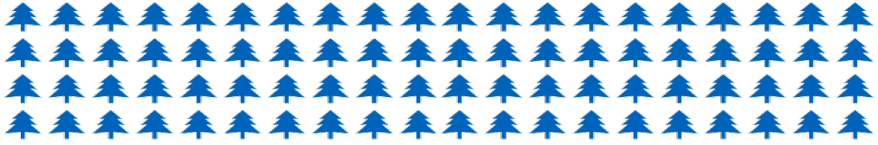
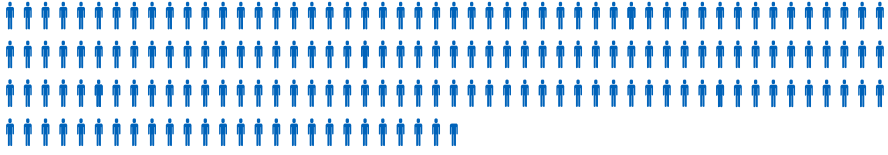


*“Our entire agency is a climate agency now”*

-Administrator Power

“Every USAID Bureau and Mission will play a part in meeting the Strategy Objectives, be it through direct climate work or by integrating actions that help tackle the climate crisis into our other development and humanitarian assistance work."

# Climate Strategy Targets 2022-2030

| | | | |
|---|---|---|---|
| **Mitigation**: CO2e reduced | **6** | Billion metric tons |  |
| **Natural & Managed Ecosystems**: Hectares protected, restored, or managed | **100** | Million hectares |  |
| **Adaptation**: People supported to be climate resilient | **500** | Million people |  |
| **Finance**: Public and private finance mobilized | **150** | Billion dollars |  |
| **Country Support**: NDCs/NAPs supported | **80** | Countries supported |  |
| **Critical Populations**: Increase equitable engagement | **40** | Country partnerships strengthened |  |

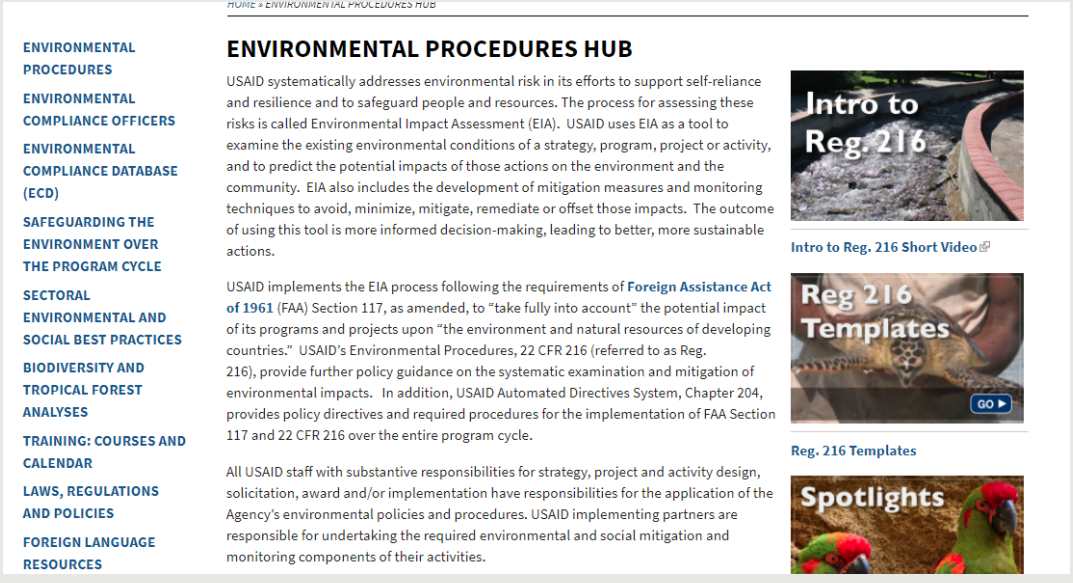

# TOOLS AND RESOURCES


# RESOURCES

- AOR/COR are the first point of contact
- MEOs, REAs, BEOs are resources for USAID staff and partners developing projects and compliance documents.
- See the Environmental Compliance Hub for Templates and Sector Environmental Guidelines
- Online USAID Training Courses

# WEB RESOURCES

USAID.GOV is the new home for USAID Compliance tools and resources




AGRILINKS
Achieving agriculture-led food security through knowledge sharing

MARKETLINKS
Market-based solutions for development

LEARNING LAB
A collaborative learning community of development professionals

LANDLINKS
USAID's knowledge sharing platform focused on land tenure and property rights

climatelinks
A global knowledge portal for climate change & development practitioners

URBANLINKS
USAID's sharing platform for resources on sustainable urban development

# Templates

USAID and the Middle East Bureau are moving towards STANDARIZED templates

Efforts are ongoing to refine and develop **Global Templates for all 22CFR216 and related documents**

- These documents are in a period of iterative improvements

**Available on the USAID Environmental Hub:** https://www.usaid.gov/environmental-procedures/environmental-compliance-esdm-program-cycle/environmental-documentation

## ENVIRONMENTAL DOCUMENTATION: TYPES & TEMPLATES

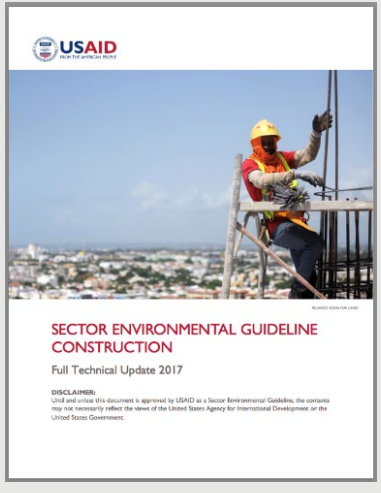
This page provides (1) brief descriptions of the various environmental compliance documents used over USAID's project and activity lifecycle and (2) access to standard templates.

Note that this page lists only the most commonly used documents. information provided is NOT a definitive interpretation of regulation and does not address all circumstances.

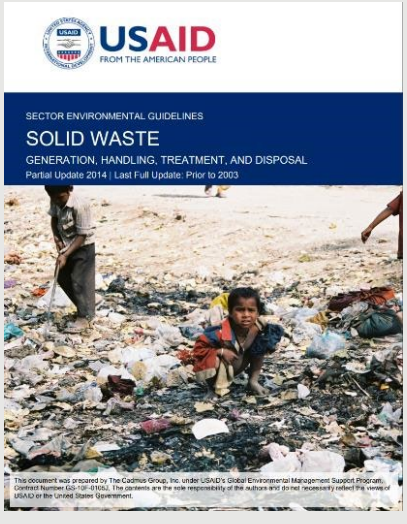
### Pre-award

| Document type (click to access template): | Summary Description |
|---|---|
| **Deferral of Threshold Decision** | Used when actions are planned, but information necessary to assign a 22 CFR 216 Threshold Decision is not available for any of the actions prior to award. See **22 CFR 216.3(a)(1)**. |
| **Environmental Assessment** (EA) | An EA is a detailed study of the reasonably foreseeable significant effects, both beneficial and adverse, of a proposed action on the environment of a foreign country or countries . USAID EAs must meet the requirements of **22 CFR 216.6**.<br><br>An EA is performed when an approved Scoping Statement identifies significant environmental issues. |
| **Environmental and Social Risk Screening Template** | The Environmental and Social Risk Screening Template is intended to be used when USAID determines the best strategic approach for development assistance in a given country or region, which is articulated in Country Development Cooperation Strategy (CDCS) or Regional Development Cooperation Strategy (RDCS) documents in order to adequately plan for scheduling and costs associated with programs, projects and activities. |
| **Initial Environmental Examination** (IEE) and IEE Amendments | Per **22 CFR 216.1(c)**, an IEE is a "first review of the reasonably foreseeable effects of a proposed action on the environment. Its function is to provide a brief statement of the factual basis for a Threshold Decision as to whether an EA or an EIS will be required."<br><br>As such, the IEE is used to justify and document Threshold Decision(s) (i.e., Negative or Positive Determination(s)) for one or more proposed actions. The IEE is also used to document Categorical Exclusions per **22 CFR 216.2(c)** and Deferrals of Threshold Decision per **22 CFR 216.3(a)(1)** for proposed actions, where these actions are part of the set of actions examined by the IEE.<br><br>*(Note: if the IEE would establish no Negative or Positive Determinations, an RCE or Request for Deferral should be developed instead of an IEE. This template is also applicable for the addition of activities where the environmental analysis and threshold decision have not been previously completed.)* |

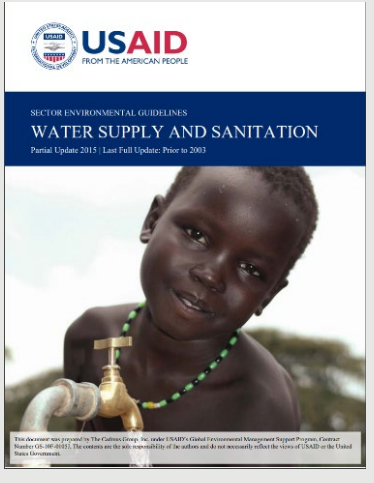
# USAID Environmental Procedures Hub: Sector Guidelines




Construction




Solid Waste




Water Supply and Sanitation

RICARDO ROJAS FOR USAID

# USAID Environmental Procedures Hub: Online Training

## DISTANCE LEARNING

### Overview

A growing set of distance learning modules addresses core aspects of USAID environmental compliance and Agency environmental procedures at the introductory level. The modules include "knowledge checks" for the learner to measure comprehension.

| | |
|---|---|
| **Target Audience** | USAID staff and partners |
| **Length** | Each module is approximately 20 minutes |
| **Emphasis** | The introductory-level essentials of life-of-project environmental compliance |
| **Field Visits** | None |

### Available modules

- **Module 1: Environmental Impact Assessment (EIA) Overview**
- **Module 2: USAID Environmental Policies and Procedures**
- **Module 3: Environmental Monitoring and Mitigation Plans (EMMPs)**
- **Module 4: Monitoring USAID Activities for Environmental Compliance**
- **Choose Your Own Adventure, Scenario 1: You are the COR**

*These modules are also available as a bundled curriculum at **USAID University** for USAID staff to earn continuous learning points (CLPs).*

*These modules are progressive in their content and should be completed in the order above.*

# ENVIRONMENTAL COMPLIANCE SUMMARY

# The Reg 216 Process Simplified

- Screen for Risk
- Assess Risk
- Manage Risk
  - Avoid, Accept, or Mitigate

REPEAT

➢ Result: Improved Outcomes


# Questions and Answers