



**USAID**  
FROM THE AMERICAN PEOPLE

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

USAID/Sudan Staff & Partners  
Environmental Compliance/ESDM Training  
Juba ▪ June/September 2010

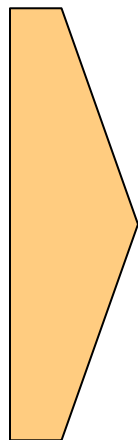


# What are sub-projects?

**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?

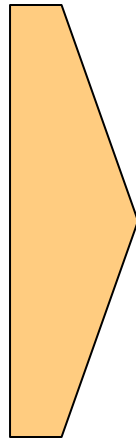
**Screen the activity**

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.



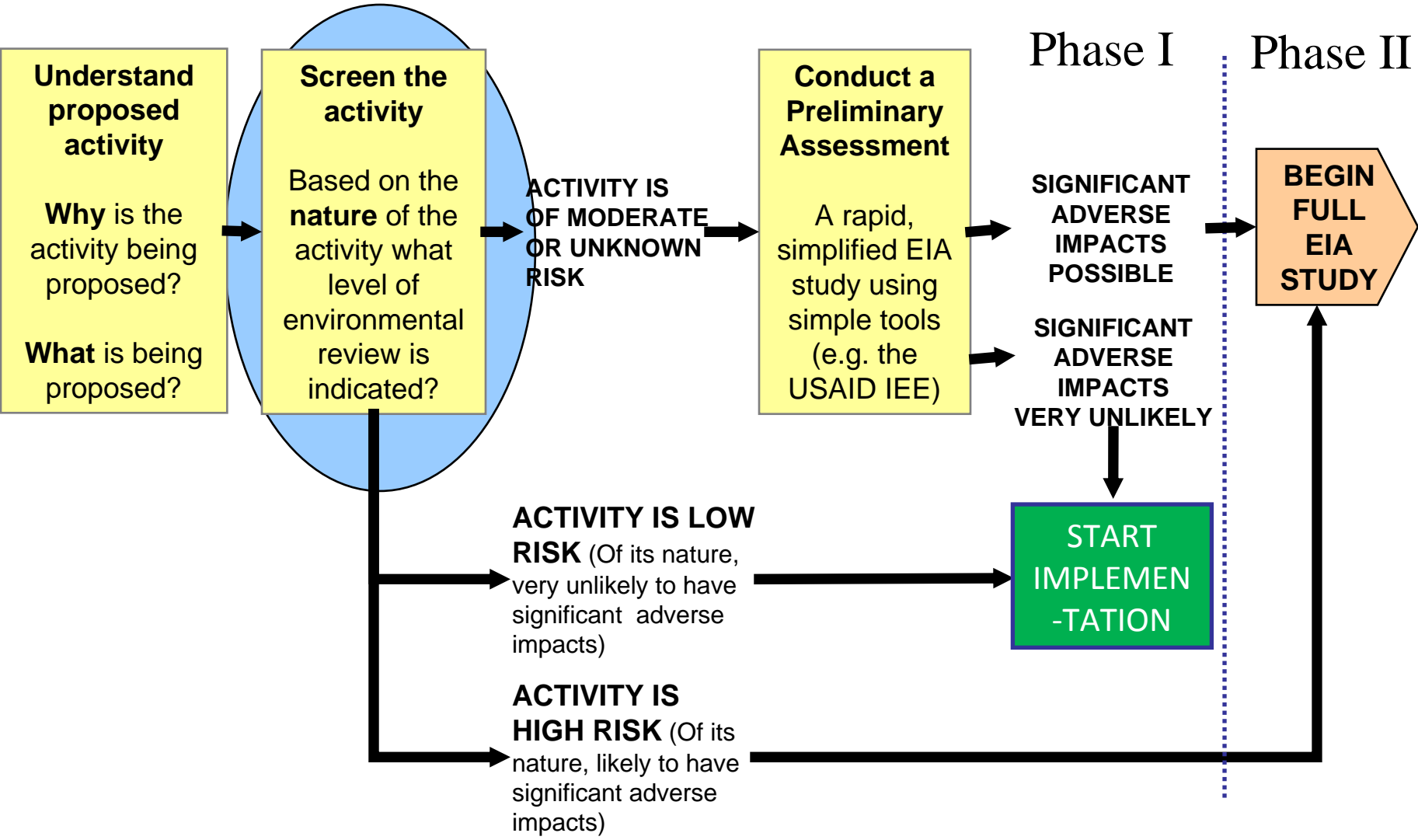
**IF** these conditions are met, sub-project activities can be **approved conditionally**.

- *That is, the IEE contains a **negative determination with conditions***
- *Condition is that each sub-project is subject to simplified environmental review*

# Getting started

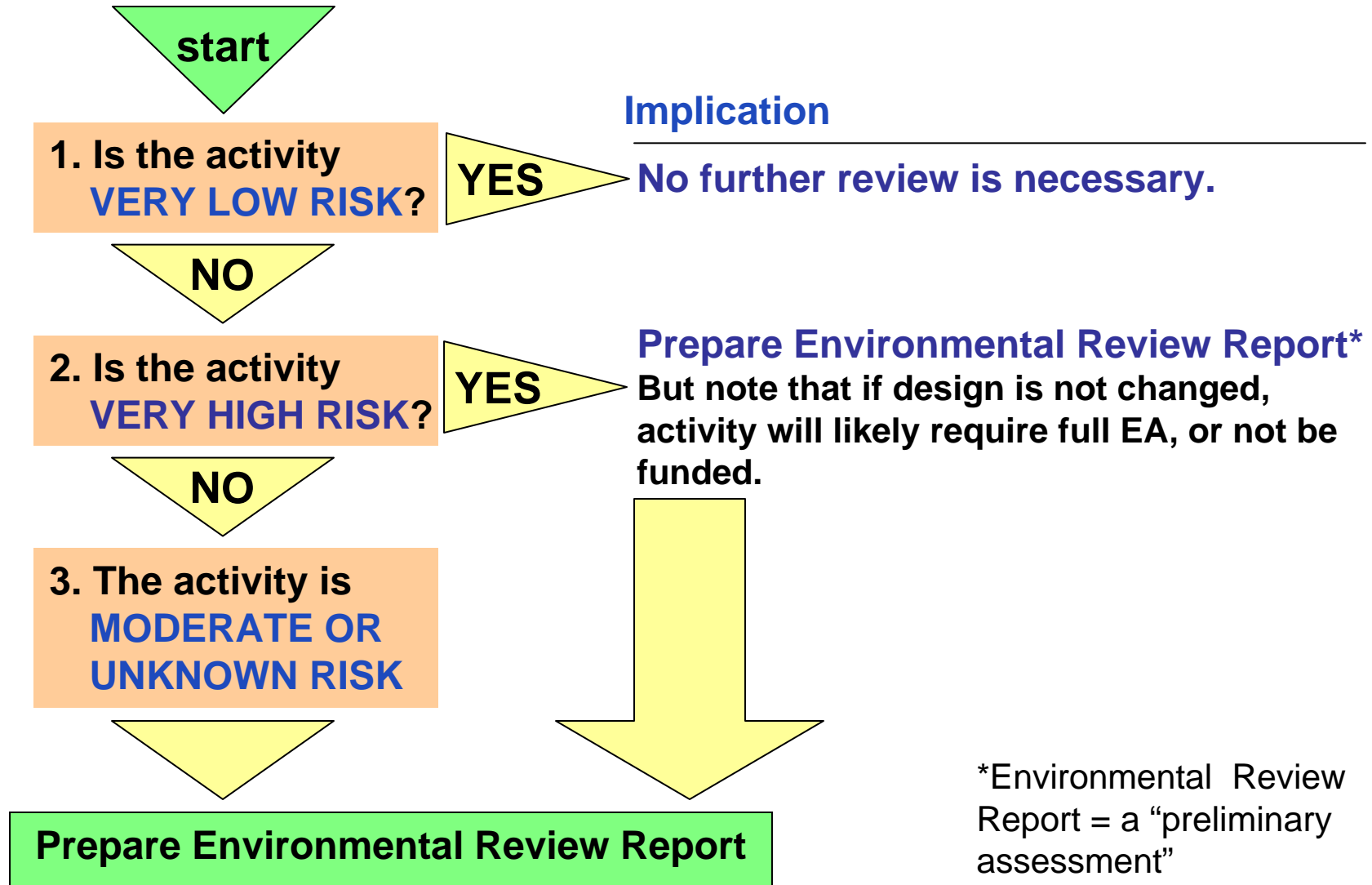
**Sub-project review  
starts the same way  
that all EIA processes  
start. . .**

# The first steps: Understand, then screen





# Screening under sub-project procedures





# How do we screen?

## The ENVIRONMENTAL REVIEW FORM (ERF) guides us 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 recommended determination**

Proposed activities (continue on additional page if necessary)	Screening result (Step 3 of instructions)			Recommended Determinations (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities)		
	Very Low Risk	High Risk	Moderate or unknown risk	No significant adverse impact	With appropriate mitigation, no significant adverse impact	Significant Adverse Impact
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						

\*These screening results require completion of an Environmental Review Report



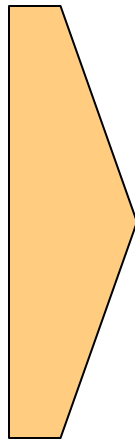
# What is an activity?



**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. . .**

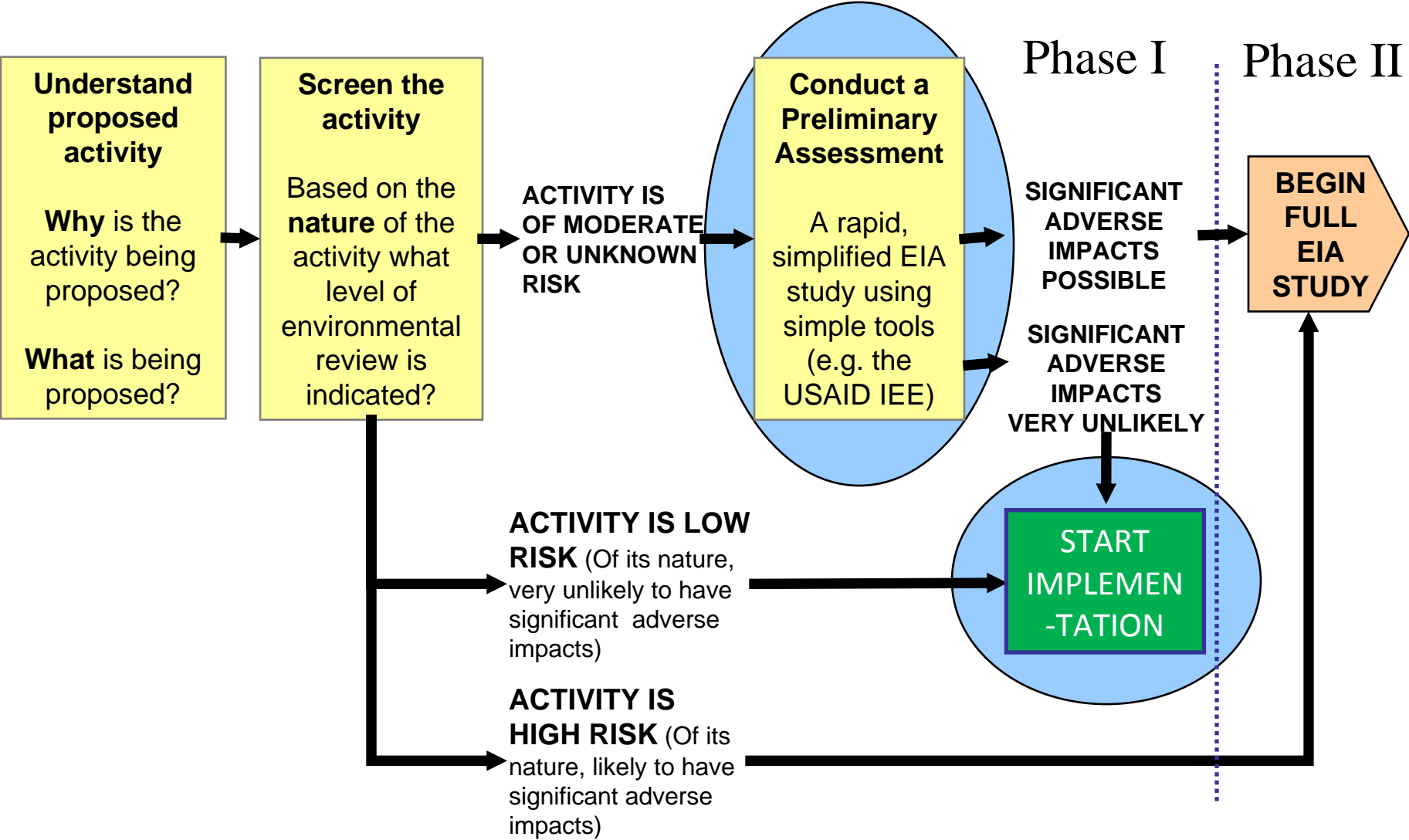
**Small-scale  
infrastructure with  
known potential to cause  
environmental harm**

**Quantity imports of  
fertilizers**

**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. Background, Rationale and Outputs/Results Expected
2. Activity Description
3. Environmental Situation
4. Evaluation of Activities with Environmental Impact Potential
5. Environmental Mitigation Actions (including monitoring and evaluation)
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

You recommend one of 3 findings:

## ERR Findings:

1. No significant adverse impacts
2. With specified mitigation and monitoring, no significant adverse impacts
3. Significant adverse



## Note:

**If the finding is**

**“With specified mitigation and monitoring, no significant adverse impacts,”**

**the mitigation & monitoring becomes REQUIRED parts of project implementation & monitoring.**





# Final steps

**RECORD** the findings

**SIGN** the certification

**SUBMIT** the  
Environmental  
Review Form & ERR

**WAIT** for approval  
from reviewers before  
expending any  
resources on the  
activity

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Proposed activities (continue on additional page if necessary)	Screening result (Step 3 of instructions)			Recommended Determinations (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities)		
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# What about the signed certification?

## The certification:

- **Affirms** that the ERF & ERR are correct & complete
- **Commits** your organization to implementing the mitigation and monitoring measures specified in the ERR
- **Commits** your organization to making sure that field staff, managers & partners understand environmentally sound practices for the activities in question.



**The certification is a binding commitment!**



**A submitted ERF/ERR is NOT automatically accepted!**

**The Reviewer may:**



**Accept OR**



**Reject**

**The screening results and findings.**

**OR the reviewer may return the ERR and require more information & analysis**

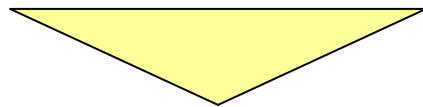


# What if you find “significant adverse impacts”

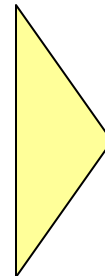


## Remember:

Activities subject to these procedures should have very low or easily controllable potential adverse impacts.



Therefore, findings of “significant adverse impacts” should happen very rarely.



If it does happen, the reviewing authority will do one of three things:

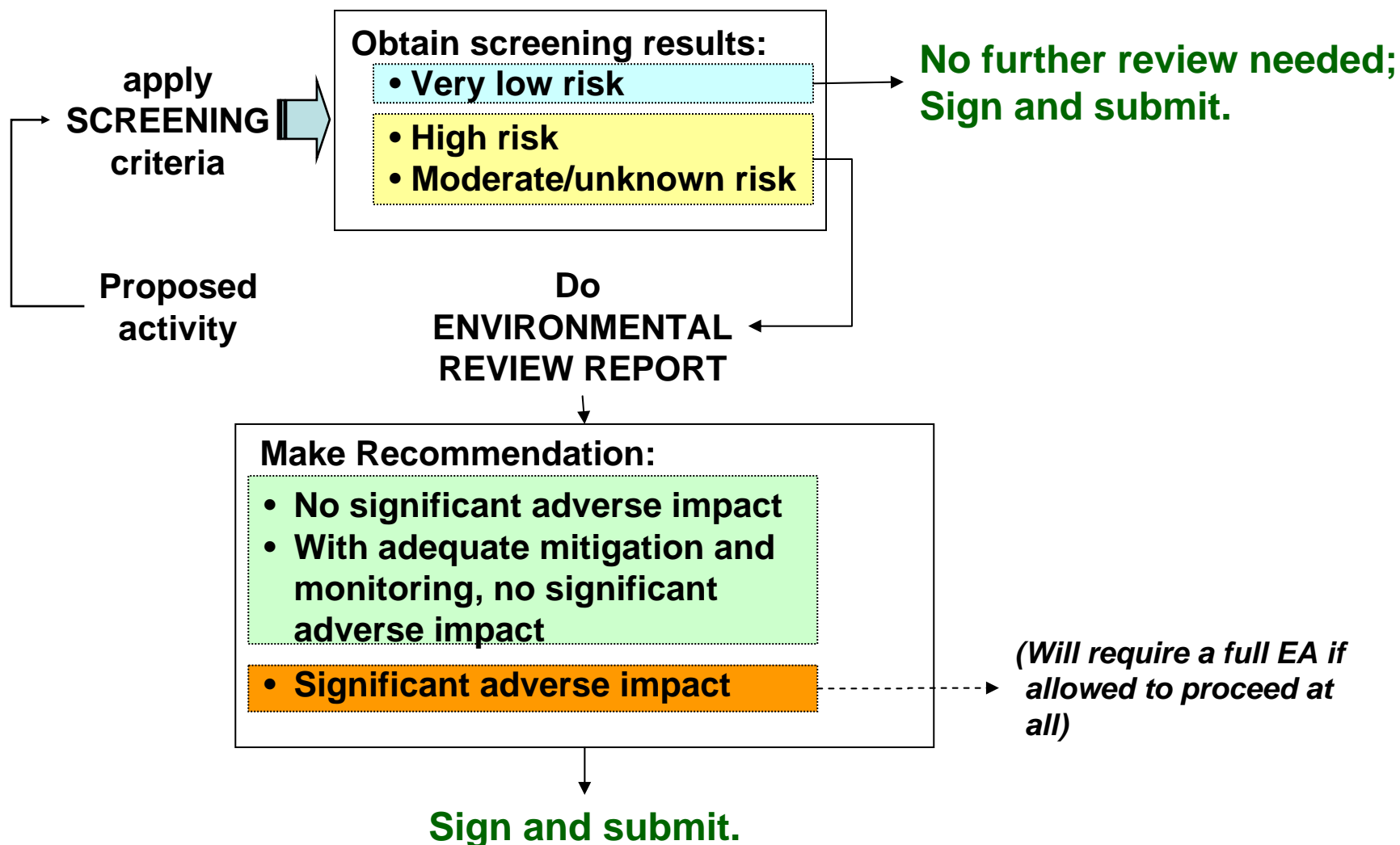
- Deny funding to the activity
- Require that the activity be revised
- Require a full EA



**If a screening result is “very high risk” or an ERR finding is “significant adverse impacts,” immediately contact the reviewing authority.**

**Discussions will be necessary!**

# 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

Change lists of low-risk & high-risk activities to reflect specific sub-project activities, and specific local environmental issues.

**3**

## Don't use the ERF at all!

The ERF is not the only option for sub-project review. 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.



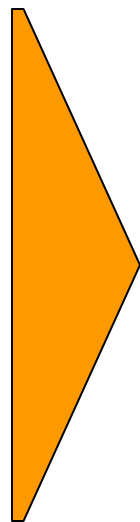
# The final message

USAID's environmental procedures are not an exercise in paperwork. **They should result in environmentally sound design.**



At a minimum, this requires compliance with the sub-project review procedures.

(Especially implementation of all mitigation and monitoring measures.)



**GO BEYOND THE MINIMUM!**

use the sub-project review process to **proactively** address environmental issues & build **capacity for environmentally sound design.**