



USAID
FROM THE AMERICAN PEOPLE

USAID's Environmental Procedures: The Big Picture

USAID Staff Environmental Training
Pretoria ▪ 11–15 May 2009

Why the procedures?

- ❖ **ESDM:**
a key objective for the **ethical and effective practice of development**
- ❖ Achieving ESDM requires **explicit and systematic attention** to environmental issues in program development and implementation
- ❖ **USAID's Environmental Procedures:**
 - *an EIA-based process* intended to assure that this 'explicit and systematic attention' actually occurs over LOP

USAID's EIA & Sustainability Mandate

An “environmental failure”

1974

In 1974, USAID provided highly concentrated Malathion to poorly trained field workers on an agricultural project in [Pakistan](#)

Working without protective equipment in the heat, the workers sprayed each other.

5 died.

1975

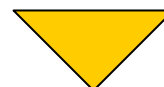
Sued by US NGOs, USAID ultimately faced a choice: *develop environmental safeguard procedures or shut down.*

USAID settled out of court, agreeing to develop such procedures.



First a court mandate

Then a mandate in law:



§117 of the FAA requires that USAID:

- **utilize an EIA process** to evaluate the potential impact of USAID's activities on the environment prior to implementation
- **“fully take into account” environmental sustainability** in designing and carrying out its development programs.

USAID's EIA & Sustainability Mandate

USAID's **Environmental Procedures** are the response to these mandates. They consist of:

- ❖ **Federal regulations:** 22 CFR 216 ("**Reg. 216**") and
- ❖ **Mandatory Agency Policies** as set out in USAID's Automated Directives System (ADS), (especially 201.3.12.2.b and 204.)

Compliance with the procedures is mandatory.

They apply to every program, project, activity, and amendment supported with USAID funds.



THE BIG PICTURE:

What do the procedures require?

- 1 The procedures specify an EIA process that must be applied to all activities **before** implementation
- 2 This process frequently results in environmental management conditions (mitigative & monitoring measures).
- 3 These measures must be implemented and monitored over the life of the activity/project (LOP).

A little more detail:

Key LOP env. compliance requirements

- 1. Environmental considerations must be taken into account in activity planning .**
- 2. No activities may be implemented without *approved Reg 216 environmental documentation.***
- 3. Any resulting mitigation and monitoring conditions are:**
 - 1. written into contract instruments.**
 - 2. implemented, and this implementation is monitored**

This documentation is the result of an EIA process

Monitoring via field inspections and review of routine project reports submitted by implementing partners

Key LOP env. compliance requirements

4. Environmental compliance is assessed in Annual Reports

Reported annually by operating unit

5. Environmental compliance documentation is maintained.

As part of the program or activity record and used to manage program implementation

For more information, see the “MEO Handbook”

Who is responsible

USAID

Establishes/approves environmental mitigation & monitoring conditions. Verifies compliance.

In the Mission

Fundamental responsibility & accountability:

- **SO Team Leader**
- **each CTO or Activity Manager**
- **ultimately with the Mission Director.**

MEO is generally a compliance advisor and coordinator.

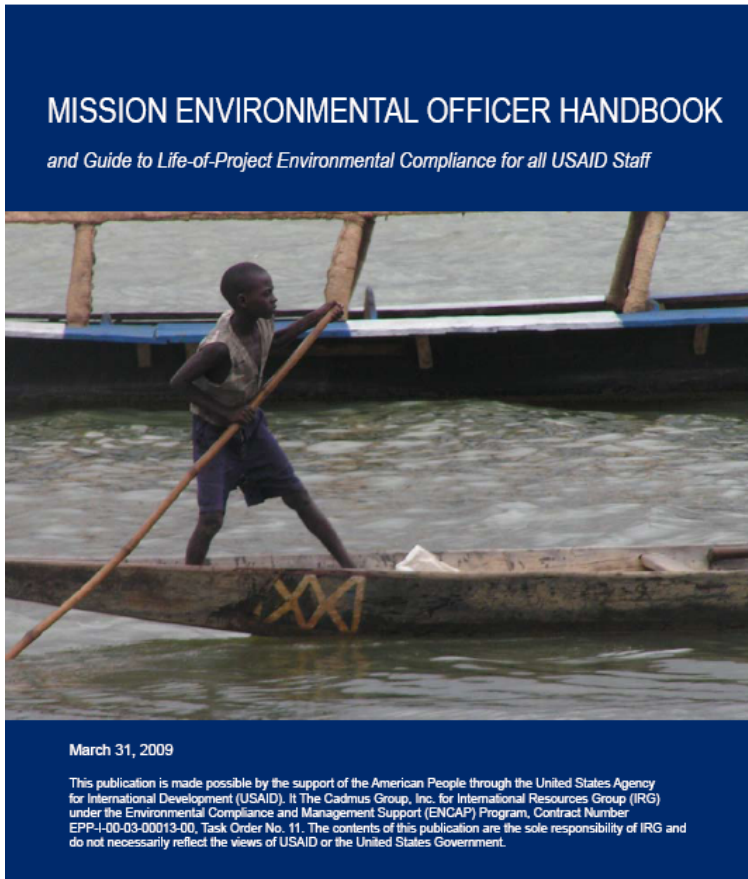
Implementing Partners

Implement mitigation and monitoring conditions in project activities & report to USAID.

Often responsible for design of detailed environmental mitigation and monitoring plan (EMMP) in response to mitigation and monitoring conditions established by the Reg. 216 documentation.

See detailed table of responsibilities; pg 7 MEO Handbook

MEO Handbook: A Guide to LOP Compliance



The *MEO Handbook*:

- ❖ Organized around LOP compliance.
- ❖ Targeted at MEOs, but a useful, concise reference for all
- ❖ Available on-line via the MEO Resource Center at www.encapafrika.org.

NEW

ANNEX: short, stand-alone environmental procedures briefing for all mission staff

This workshop draws heavily from the Handbook

Looking ahead

❖ This session: the “big picture” only

❖ Coming up:

- *Reg 216 (the pre-implementation EIA process)*
- *Reg 216 documentation (the IEE)*
- *Implementing environmental mitigation & monitoring conditions*
 - Building environmental compliance requirements into procurement instruments
 - Environmental Mitigation and Monitoring Plans

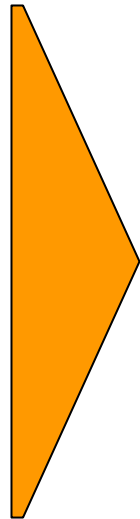
The final message

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



At a minimum, this requires compliance.

(Especially implementation and monitoring of all conditions.)



GO BEYOND THE MINIMUM!

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