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Prerequisites for Implementation of IEE/EA conditions

So now we have a high-quality IEE. . .

- ❖ IEEs (and EAs) are useless unless the conditions they establish are implemented!

- ❖ USAID's environmental procedures therefore *require* implementation

Review: 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**

What does the ADS say?

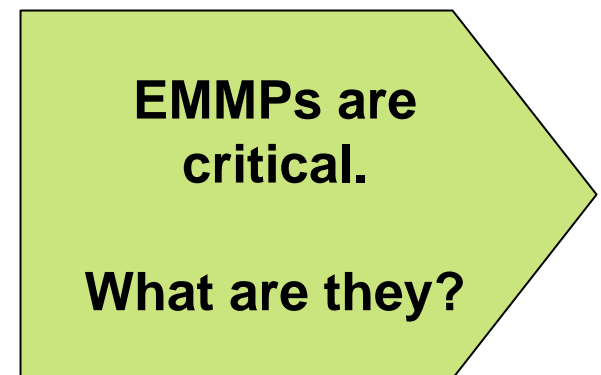
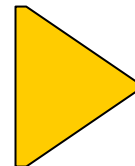
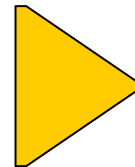
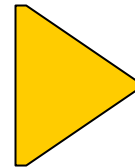
Team Leaders and Activity Managers or CTOs must ensure that all mitigative measures are implemented over the life of the project (ADS 204.3.4)

(For grants and cooperative agreements, this responsibility is specifically assigned to the CTO (303.2.f))

Implementation of IEE/EA conditions

Practically, implementation & monitoring of M&M conditions requires that:

1. Conditions from SO-level IEEs or EAs are mapped to the activity/project level.
2. Complete **Environmental Mitigation and Monitoring Plan (EMMP)** exists
3. Workplans and budgets integrate the **EMMP**
4. PMPs track **EMMP** implementation



What is an EMMP?

An EMMP sets out:

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

From IEE, include only activities with conditions

To determine if mitigation is in place and successful
(i.e., visual inspection for leakage around pit latrine; sedimentation at stream crossing, etc.)

For mitigation, and for monitoring and reporting.
(May be different)

Activity	Mitigation Measure	Monitoring Measure(s)	Monitoring & Reporting Schedule	Responsible Party(ies)

See EMMP template in sourcebook

If well-specified, quote directly from IEE
If not well-specified in IEE, define more specifically

(e.g., monitor weekly, report in quarterly reports and more frequently under specified conditions)

Implementation of IEE/EA conditions



These 4 “requirements” are not specified by Reg. 216 or the ADS.

But systematic, accountable implementation of IEE/EA conditions is almost impossible without them

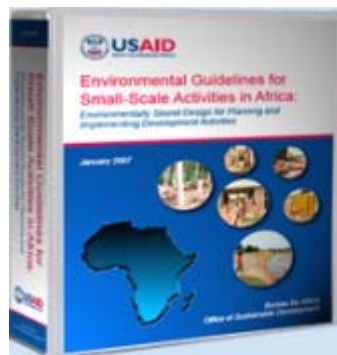
For more information. . .



See the ***MEO Handbook*** for:

- *More details*
- *Discussion of principles for monitoring IEE/EA implementation, including roles and responsibilities.*

❖ **Principles of Mitigation and Monitoring: See session 6 (Day 1)**



Mitigation and Monitoring measures:
see the ***Small-Scale Guidelines***