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USAID Environmental Procedures applied to Subgrant or "Umbrella" projects



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What are “umbrella” projects?

- ◆ Umbrella projects fund a number of small-scale activities via SUBGRANTS
 - ◆ Typically, PVOs or NGOs receive money from USAID and give sub-grants to other organizations
 - ◆ Umbrella projects are often used to:
 - ➔ Implement community-driven development
 - ➔ Fund micro and small-enterprise projects



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“Umbrella” projects & Reg. 216

- ◆ Sub-activities often not defined when the umbrella project is proposed



This poses difficulties for the usual Reg. 216 process

- ◆ If activities are not defined, they receive a DEFERRAL in the IEE process
 - Under a deferral, funds cannot be committed
- ◆ EACH sub-activity would require an IEE amendment → very time-consuming!



The “umbrella” IEE—an alternative to deferrals

- ◆ The umbrella IEE is an alternative to deferrals for sub-activities:
 - ◆ An umbrella IEE sets out a **NEGATIVE DETERMINATION WITH CONDITIONS** for undefined sub-activities
 - ◆ The primary condition is that subgrants are subject to environmental review and documentation
 - ➔ This is called “subgrant environmental review”



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Subgrant environmental review: an overview

- ◆ The PVO completes *environmental review forms* (ERF) for the sub-projects as they are defined
- ◆ The ERF guides the applicant through a SCREENING PROCESS.
 - ◆ This process is SIMILAR to the Reg. 216 Screening process
 - ◆ However, it is SIMPLIFIED and CUSTOMIZED to the umbrella project.



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Subgrant environmental review: an overview

- ◆ The screening process indicates if an *environmental review report* (ER) is necessary
- ◆ An ER is similar to an IEE, EXCEPT:
 - ◆ the ER is typically shorter
 - ◆ The ER does not use Reg 216 terminology



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Using an ERF for subgrant environmental review

NOTE:

There is no one model of an ERF.
The example used here is found on pg G-13 of the EPTM.



STEP 1:

Provide basic information about the proposed activity and the applicant



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Using an ERF for subgrant environmental review, cont'd

- ◆ STEP 2:
List all proposed activities.
 - ◆ Include all phases & ancillary activities

- ◆ STEP 3a—SCREENING:
Identify very low-risk and very high-risk activities.
 - ◆ Do this by comparing proposed activities to a “low-risk” and “high-risk” list.
 - ➔ Lists are based on Reg 216 & other directives



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Using an ERF for subgrant environmental review, cont'd

◆ STEP 3b—SCREENING:

Identify activities of *moderate* or *unknown* risk.

- ◆ All activities that are not “high-risk” or “very low-risk” are considered to be of “moderate or unknown risk”



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Using an ERF for subgrant environmental review, cont'd

◆ STEP 4

Determine whether you will write an Environmental Review Report (ER)

- ◆ If ALL proposed activities are “very low-risk,” then no ER is necessary
- ◆ If ANY activities are “high risk” or “moderate/unknown risk,” an ER must be prepared



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Using an ERF for subgrant environmental review, cont'd

◆ STEP 5

Write the ER, if required (~3 pgs)

- A. Summary of Proposal
- B. Description of Activities
- C. Environmental situation and host country requirements (BASELINE INFORMATION)
- D. Evaluation of Environmental Impact Potential
- E. Environmental Mitigation Actions (including monitoring)
- F. Other information (maps, sketches, etc)



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Using an ERF for subgrant environmental review, cont'd

◆ STEP 6

Based on the ER, recommend a determination for EACH “high risk” or “moderate/unknown” risk activity:

- ◆ 3 possible determinations:
 - ➔ No significant adverse impacts
 - ➔ No significant adverse impacts, given specified mitigation and monitoring.
 - ➔ Significant adverse impacts



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Using an ERF for subgrant environmental review, cont'd

- ◆ STEP 7
Summarize recommended determinations
- ◆ STEP 8:
Sign certifications
- ◆ STEP 9:
Attach ER (if any) and submit.



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ERF Approval Authority

- ◆ Approval authority depends on:
 - ◆ Screening outcomes
 - ◆ Recommended determinations
- ◆ When screening determines that ALL activities are “very low risk,” the USAID Mission can approve the ERF.
 - ◆ This is different from the IEE, which requires USAID/Washington approval.



ERF Approval Authority, cont'd

◆ In other cases:

Screening outcome ↓	Recommended Determination		
	No significant adverse impacts	No significant adverse impacts given specified mitigation and monitoring	Significant adverse impacts
Moderate or unknown risk*	MISSION*	MISSION*	REQUIRES EA. MISSION MUST INVOLVE REO/BEO
High Risk	Unlikely to be a proper determination MISSION + REO/BEO	MISSION + REO/BEO	REQUIRES EA. MISSION MUST INVOLVE REO/BEO

*however, if the activity is of a new type, the mission should involve the BEO/REO.



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Responsibilities of the applicant

- ◆ Mitigation and monitoring conditions specified in the ER are *binding conditions* and must be followed.
- ◆ All other *certification conditions* are also binding and must be followed.
- ◆ Compliance will be confirmed by monitoring and on-site inspections.



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Phase 1: Initial inquiries

◇ Understanding the project:

- ◆ part 1. Understand *why* the project is being undertaken

why a road?



why a dam?



→ Answering 'why?' helps frame alternatives

