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Environmental Compliance Special Topic: DO-level IEEs USAID/Southern Africa

December 2014

Health IEE: Improved Health Outcomes for South Africans – The Basics

**APPROVED BY GLOBAL HEALTH AND
AFRICA BUREAU**

Expiration: Dec. 31, 2018

IR 3.1: HIV and Tuberculosis (TB) infections reduced

IR 3.2: Increased sustainability of effective HIV/AIDS and TB response systems

IR 3.3: Improved care and treatment of vulnerable populations

Annex 1: GoSA Healthcare Waste Procedures and Guidance

Annex 2: Healthcare Waste Management for Small Scale Facilities:
Minimal Program Checklist and Action Plan

Annex 3: Additional Guidance for Installation of Park Homes

Annex 4: Subsidiary Environmental Review for Umbrella Grant Projects

Intervention Categories

Intervention Category	Categorical Exclusion(s)	Negative Determination(s)
1. Health Care Waste Management (HCWM)		✓ (w/ conditions)
2. Procurement, storage, management, distribution and disposal of public health commodities & equipment; strengthening public health commodity supply chain management.		✓ (w/ conditions)
3 Construction		✓ (w/ conditions)
4. Water and Sanitation for Health (WASH)		✓ (w/ conditions)
5. Capacity Development/Training: a) prevention, care and treatment HIV/AIDS, TB and MDR-TB; b) MCC; c) PMTCT, MCC, OVC, GBV		✓ (w/ conditions)
6. Social marketing, Education and Behavioral Change Communication (BCC)		✓ (w/ conditions)
7. Policy & strategy development (including formulation of clinical norms)	✓	
8. Health Systems Strengthening (HSS)	✓	✓ (w/ conditions)
9. Umbrella Grant Mechanisms in support of DO3		✓ (w/ conditions)

Categorical Exclusions

Under Reg. 216, ONLY activities fitting in a set of fifteen specific categories qualify as categorical exclusions*, including. . .

- (i) Education, technical assistance, or training programs (as long as no activities directly affect the environment)
- (iii) Analyses, studies, research workshops
- (v) Documents or information transfers
- (viii) Nutrition, health, family planning activities ***except where medical waste is generated or for water activities***
- (xiv) Host country capacity building ***except when the environment is directly effected***

***See 22 CFR 216.2(c)(2) for full list**

! No categorical exclusions are possible when an activity involves pesticides (e.g., IRS)

Activity Specific Documentation

The IEE says that activities have:

Low or Moderate Impact
(Negative Determination
with Conditions)

No Impact
(Categorical Exclusion)



Develop an Environmental Mitigation and Monitoring Plan (EMMP) for those activities



Monitor the activities.
If they change, and you believe they may now impact the environment,
Consult your MEO

HINT!!!

The Environmental Threshold Decision (ETD) summarizes the activity classifications.

Impact of Activity Identified by the IEE

Health Care Waste Category

Activity

Impacts

Supply chain activities at all levels involving procurement, storage, management and/or disposal of public health commodities.

Improper disposal in *ad hoc* disposal pits can:

- Result in runoff into surface waters and cause responses at low concentrations
- Contaminate drinking water by leaching or improper treatment of wastewater.
- Cause air pollution and release dioxins when waste is openly burned

Conditions of Activity Identified by the IEE

Activity

Supply chain activities at all levels involving procurement, storage, management and/or disposal of public health commodities.

Conditions

- Ensure that to the greatest extent possible that medical facility has proper means of handling or expired drugs.
- Return expired pharmaceuticals to the manufacturer. If not possible, follow WHO guidelines for Safe Disposal of Unwanted Pharmaceuticals.
- Store according to MSDS recommendations.
- Disposal should follow USAID Solid Waste Sector Environmental Guideline (<http://www.usaidgems.org/Sectors/solidWaste.htm>)
- IPs will work with the South African National Department of Health on all aspects of essential medicine supply chain management.

Example Mitigation Measures for the EMMP

Activity

Supply chain activities at all levels involving procurement, storage, management and/or disposal of public health commodities.

Mitigation Measures

- Ensure contract is established with a medical waste disposal facility with an appropriate incinerator.
- Train staff on procedures for clearing marking waste containers.
- Designate an area for holding waste for disposal.
- Implement a schedule for verifying expiration dates of pharmaceuticals
- Collect all MSDS in a central location for access by the staff
- Integrate health care waste management into the roles and responsibilities of key hospital staff positions.

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Bringing it All Together

Activity	Adverse Impacts	Mitigation Measure	Monitoring Indicators/ Criteria	Monitoring & Reporting Schedule	Responsible Party(ies)
Supply chain activities at all levels involving procurement, storage, management and/or disposal of public health commodities.	Damage water quality from leaching into groundwater and surface water.	<ul style="list-style-type: none"> -Designate holding area -Implement a schedule for verifying expiration dates -Integrate HCWM into roles and responsibilities 	<ul style="list-style-type: none"> ‑# health centers with designated holding area ‑% checks completed within 7 days of scheduled date ‑Hospital staff assigned HCWM role within their employment contract 	<ul style="list-style-type: none"> ‑Annually ‑Quarterly ‑Annually 	<ul style="list-style-type: none"> ‑Health supervisor ‑Health care worker ‑Health administrator

Exercise

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| 1. Strengthening service delivery platforms, especially in the public sector. | 1. Categorical Exclusion |
| 2. Community advocacy for psychosocial support programs | 2. Categorical Exclusion |
| 3. WASH counseling and support within NACS, including counseling on safe food preparation and storage and point-of-use water purification treatment. | 3. Negative Determination with Conditions |
| 4. Increase availability of key health commodities | 4. Negative Determination with Conditions |
| 5. Health data collection | 5. Categorical Exclusion |
| 6. Supply chain management of key prevention and care & treatment commodities to ensure continuous supply for medicines | 6. Negative Determination with Conditions |
| 7. Purchase and operation of an incinerator | 7. Positive Determination |
| 8. Health counseling | 8. Categorical Exclusion |
| 9. HIV and AIDS testing | 9. Negative Determination with Conditions |
| 10. Rehabilitation of protected water sources | 10. Negative Determination with Conditions |