

Synthesis of BPR Findings

(Note: findings characterize Mission compliance status at the time of the BPR; they do NOT reflect changes resulting from the BPR.)

1. **“upstream” compliance** (i.e. Reg. 216 documentation coverage for the Mission Portfolio) is generally reasonable, but not perfect:
 - Approval delays, especially for PERSUAPs, are a problem
 - Some but not all missions verify IEE coverage for new activities
2. However, **poor IEE Quality & Lack of Specificity** adversely affect the ability of IEEs to serve as a clear basis for project mitigation actions and project compliance.
 - In part, the problem is intrinsic to sector program level IEEs (SO-level IEEs), particularly those put in place when the sector program is in the early design stage.
 - Problem is not that there are a few notably bad IEEs, but that the current standard of IEE practice in AFR is not adequate.
3. In almost every mission, **a few project examples of good “downstream” compliance** exist. (that is, IEE/EA conditions are being implemented and reported on.)
 - But these examples of strong compliance are person-driven (a proactive C/AOR, a diligent partner), not systems-driven.
 - Compliance seems to be better for Title II CSs (who write their own, project-level IEEs)
4. Generally though, **IP reporting on environmental compliance is very, very limited**. That is, there is no auditable, verifiable record of IEE implementation (or lack thereof)
5. This makes determining the extent of IEE conditions implementation difficult. Different BPRs have had differing levels of success in truly verifying the extent of IEE conditions implementation on a project-by-project basis—depends on level of team cooperation, partner availability.
6. However, in the large majority of cases where we have successfully “drilled down” to the project level, **implementation of IEE/EA conditions is POOR**:
 - Partners and C/AOTRs unaware of conditions
 - Contractual requirements for conditions implementation not in place.
7. **C/AOR awareness of environmental compliance responsibilities is generally poor**—and where present, is often limited to “upstream compliance.” (Of well-informed/pro-active A/CORs, almost all have attended ESDM trainings.)
8. Effective **sector team compliance planning as mandated by ADS is almost non-existent**.
9. **MEO position is chronically under-resourced**. In some cases MEO authority and reporting lines are adequate—in some cases not.
10. **Environmental compliance verification is seldom part of the Mission M&E function**.