

Special Topic: Subproject Review

Objective

Brief the subproject review concept and procedure and the updated Environmental Review Form. Outline the circumstances under which this process can be employed within AFR projects/programs

Format:

Presentation and Q&A.

Summary

Many USAID programs and large projects include *subprojects*— small-scale activities that are (1) carried out within—or “under the umbrella” of—a larger project, and (2) are not fully identified or designed when the larger project or program is approved.

Subprojects pose an environmental compliance challenge: Reg. 216 requires environmental review prior to activity implementation—but subprojects are not specifically defined/designed when the IEE is written.

The solution is typically that the IEE contains a *negative determination with conditions* for these activities. The condition is that a simplified EIA process is established to review subprojects and establish mitigation and monitoring conditions. This is generally only allowable if:

- The *general nature* of sub-project activities is known
- These activities generally have low or easily controllable potential adverse impacts.

The *Environmental Review Form (ERF)* is the most common instrument for implementing these simplified environmental review procedures for subprojects. The form’s instructions guide the reviewer through the subproject screening and preliminary assessment processes.

The ERF was recently updated to make appropriate use more clear, and to reflect changes in best practice over the past several years. This session will highlight the changes made.

Under the ERF screening process, activities are classified as either (a) requiring no further environmental review, or (b) requiring at least an environmental review report.

The environmental review report resembles a shorter, simplified IEE. Like the IEE, it is equivalent to a “preliminary assessment” in general EIA procedures.

Key resource

Updated *Environmental Review Form* (in this section of the Sourcebook)