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Reporting on Environmental Compliance

GEMS Environmental Compliance-ESDM Training Series
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**So an IP has a high-quality EMMP
AND is implementing it rigorously. . .**

USAID needs to know.*

- 1. Project reporting must provide an auditable record of environmental compliance*
- 2. One or more key project performance indicator(s) (project results framework) should reflect overall environmental soundness/ env compliance.*

* ADS requires C/AOTR to actively manage and monitor compliance with any IEE/EA conditions.

Let's look at #1 first:

“Project reporting must provide an auditable record of environmental compliance”

Quarterly or semiannual reports should contain a separate environmental compliance section.

The section must provide sufficient information on the status of EMMP implementation for USAID to effectively fulfill its oversight and performance monitoring role

(In addition, IEEs may contain specific reporting requirements that must be addressed.)



Note: Title II CSs must submit an Annual Environmental Compliance Status Report.

If the EMMP contains a “monitoring record” section:

The EMMP itself, updated with current monitoring results, can simply be appended to the report.

	Incorporated in final technical specifications		Built-as specified? (confirmed by field inspec.)			Notes (Issues & resolution)
	Date Confirmed	Initials	Y/N	Date of inspection	Initials	
Design requirement						
GRADING, SEPTIC & DRAINAGE. If construction results in substantially increased slope of any land within 10m of the stream, that slope must be protected with berms, plantings, etc.)						
Site grading and drainage shall be designed and constructed to prevent accumulation of standing water						
Aprons must be installed and drainage provided at water supply point(s)—no standing water allowed.						
No direct gray or brown-water discharge to stream is allowed. All drainage with the exception of storm runoff and water point drainage must be channeled to the septic system.						
If septic tank design is a pump-out tank without leach field, assure impermeable tank construction or min 30m separation between tank and stream and nearest shallow well.						

Excerpt of EMMP with monitoring record for medium-scale construction project.

If the EMMP contains a “monitoring record” section:

The EMMP itself, updated with current monitoring results, can simply be appended to the report.

Mitigation Measure	Responsible Party	Monitoring Scheme			Est. Cost	Monitoring Log		
		Indicators	Data source/ Method	How Often		Date	Result	Follow-up
3. Install & properly operate canal-level flow regulation structures	Project agricultural technician	<ul style="list-style-type: none"> • # of doors and other flow-control structures installed • % of Ha. under flow control • % of secondary & tertiary canals showing significant erosion damage after each growing season 	Reports Field visit	Quarterly				
4. Protect upper slope with fruit (mangoes, citrus, avocado) and forest trees	Project agricultural technician	# of trees planted and survived <ul style="list-style-type: none"> • % of at-risk upper slope land protected • total m3 of sediment removed from canals over each rainy season. 	Reports Field visit Comparison with baseline information	Quarterly /Annual				

The irrigation rehabilitation EMMP from the “Intro to EMMPs” session

❖ **For large projects with complicated EMMPs, a text summary/short analysis of EMMP implementation is needed.**

- *Highlight key mitigation activities underway in the period, any significant issues encountered, and corrective actions/adjustments made.*



Now on to requirement #2:

“Mainstreaming” environmental issues into the project results framework

“One or more key project performance indicator(s) (project results framework) should reflect overall environmental soundness & compliance.”

This does NOT mean that:

- Every mitigation measure must be captured in core indicators
- Every core program indicator must be “environmentalized”

This IS to say that *overall*, project success must be partly measured on the most critical elements of environmental soundness/ compliance

This applies to new awards.

Where EMMPs are developed after the PMP is established, it may not be possible to change key program indicators.

“Mainstreaming” environmental issues into the project results framework

EXAMPLE: Water Point Provision

Key Program Indicators:

- Protected* water points established
- # beneficiaries receiving water from protected water points
- % of water points with no fecal coliforms per 100 ml
- % of water points established that are clean after 6 months

* Protected = fenced against livestock, drained

Again, this intervention will NOT show good performance. . .



“Mainstreaming” environmental issues into the project results framework

EXAMPLE: Food for Peace

How much firewood does a typical Food for Peace (FFP) program use?

~1 kg firewood/person/day x 70,000
beneficiaries x 365 d

~30,000 MT of firewood /yr

Mitigation:

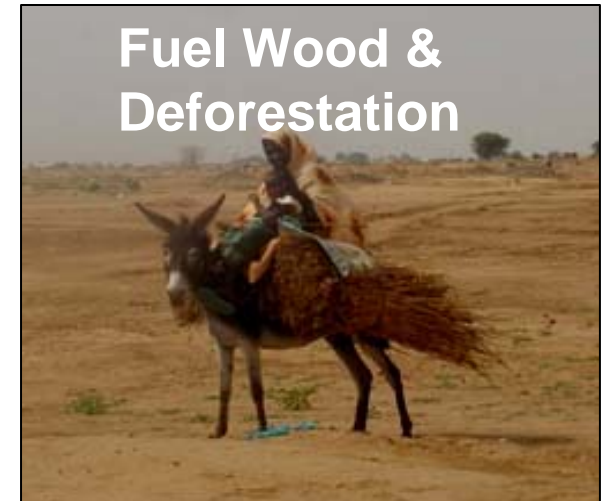
Improved cookstoves and cooking practices

Added to key program indicators :

- Amount of fuel saved by improved practices
- Amount of time saved by improved practices

NOT just number of stoves distributed

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“Mainstreaming” environmental issues into the project results framework

EXAMPLE: Road rehabilitation

Typical Indicator:

- Km of road rehabilitated

Strengthened, “Environmentalized” indicator:

- Km of road rehabilitated under environmentally sound practices.*

*provide definition of environmentally sound practices from EMMP





Who reviews EMMPs & environmental compliance reporting inside USAID?

Will environmental compliance checks be part of Mission M&E?

As with all other aspects of the project, the A/COTR is the primary reviewer. But the MEO and M&E function may also be involved.

Environmental Compliance Verification/Oversight by USAID

1. Prior Review/Approval of partner-developed

→ EMMP →

ensure responsive to IEE/EA conditions

→ Budgets and workplans →

ensure EMMP implementation planned & funded

→ Project Reporting Framework →

ensure environmental compliance reporting requirements are met

Primary responsibility for ensuring compliance lies with C/AOTR.

MEO will also review/clear where activities are env. Sensitive &/or IEE/EA conditions are complex.

2. Ongoing review of partner progress reports to monitor EMMP implementation

MEO on distribution list for IP's quarterly/semi-annual project reports.

3. Field visits:

→ at a minimum, all visits integrate a quick check for significant env. design/management problems

→ For environmentally sensitive activities, specific visit(s) to audit against EMMP.

Most field visits are by C/AOTR or M&E Officer

MEO should visit the most environmentally sensitive activities (REA may assist)