

Session 11.

Environmental Compliance in Implementation

Objectives

Achieve an understanding of the basic elements of environmental compliance in implementation: (1) USAID's responsibility to provide verification & oversight and (2) IP reporting on EMMP implementation and effectiveness. Consider how environmental issues can be "mainstreamed" into the project results framework.

Format

Presentation.

Summary

ADS 204 requires that C/AORs monitor and evaluate on an ongoing basis whether the environmental mitigation required by the governing IEE(s)/EA is being implemented and is effective. (In other words, C/AOR oversight responsibilities extend to environmental compliance, just as they do to other elements of project implementation). Practically, this requires that IPs not only systematically comply with IEE/EA conditions by developing and implementing EMMPs, but that they *report* to USAID on this implementation.

IP environmental compliance reporting consists of two elements—one required and one recommended:

1. **Required: Project reporting must provide an auditable record of environmental compliance.**

Generally, IP's 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.

If the EMMP contains a "monitoring log" section, then the EMMP itself, updated with current monitoring results, can simply be appended to the report.

For large projects with complicated EMMPs, a text summary/short analysis of EMMP implementation is needed. This should highlight key mitigation activities underway in the reporting period, any significant issues encountered, and corrective actions/adjustments made.

2. **Strongly recommended: One or more key project performance indicator(s) (project results framework) reflect overall environmental soundness/environmental compliance.**

In other words, the most critical elements of environmental soundness/ compliance should be "mainstreamed" into the project results framework. For example:

In a water point provision project, the IP might use the indicator "number of protected water points established with zero fecal coliform after 6 months" rather than "number of water points established."

In a road rehabilitation project, the IP might use the indicator "km or road rehabilitated under environmentally sound practices" rather than "km of road rehabilitated."

In both cases, the “environmentalized indicator” demonstrates that the core project activities are being executed with attention to environmental soundness/compliance. It is NOT expected or appropriate to “environmentalize” every key indicator, or to capture every mitigation measure.

(This best practice applies to new awards. Where EMMPs are developed after the PMP is established, it may not be possible to change key performance indicators.)

Missions should not rely on IP progress reports alone to track environmental compliance. Field visits at minimum should include a quick check for significant environmental design/management problems (for small-scale wat/san or health care activities, use the ENCAP Visual Field Guides). For environmentally complex activities, specific field visits should be made to verify EMMP implementation.

IP and USAID environmental compliance roles and responsibilities post-award are as follows:

Project stage	Implementing Partner	USAID
Workplan & PMP Development	<ul style="list-style-type: none"> Develops EMMP Integrates EMMP into budget & workplan. Determine environmental compliance reporting 	<p>Review and approval of:</p> <ol style="list-style-type: none"> 1. the EMMP (for responsiveness to IEE/EA conditions & sufficiency of monitoring); 2. The budget/workplan (to verify that EMMP implementation is planned and funded); and 3. The reporting framework to assure that environmental reporting requirements are met.
Implementation	<ul style="list-style-type: none"> Implementation of EMMP. Reporting on EMMP implementation 	<p>Ongoing review of partner progress reports to monitor EMMP implementation</p> <p>Field visits—at a minimum, all visits should integrate a quick check for significant environmental design/management problems. For environmentally sensitive activities, specific visits should be made to verify EMMP implementation.</p>