

Session 13.

Special Topic: Environmental Compliance for Sub-Projects and Sub-Awards

Technical presentation and dialogue

Summary

Many USAID programs and large projects include *subprojects*. These are 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. However, subprojects typically are not yet clearly defined/designed when the overarching project IEE is written.

The standard solution is that the IEE contains a *negative determination with conditions* for the anticipated subproject activities. The “condition” in this scenario is that a simplified EIA process is established to review subprojects and determine mitigation and monitoring conditions. This is typically only allowable if:

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

The Africa Bureau *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 a subproject screening, and then preliminary assessment process for subject activities.

The Africa Bureau ERF was updated in late 2010 to clarify appropriate use, and to reflect recent changes in AFR best practice. This session will highlight the recent changes and overall use/application of the ERF.

Under the ERF screening process, subproject 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.

Objectives

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

Reference Documents

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