Environmental Compliance Reporting

GEMS Environmental Compliance-ESDM Training Series

USAID/Malawi • March 2013
Session Objectives:

- Understand USAID criteria for environmental compliance reporting
- Review role of EMMP in the reporting process
- Discuss “mainstreaming” of project environmental performance for reporting purposes
- Learn how to “environmentalize” key project indicators
The EMMP is in place … now what?

Now that EMMP is being implemented, **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/environmental compliance.

**What does the ADS say?**

Team Leaders and Activity Managers or C/AOTRs must actively manage and monitor compliance with any IEE/EA conditions, modifying or ending activities not in compliance. (ADS 202.3.6, 204.3.4 and 303.2.f)

Let’s look at #1 first:
Environmental compliance reporting can be integrated as part of ‘regular’ project reporting:

- Quarterly or semi-annual project reports should contain a separate section addressing environmental compliance.
- The section must provide *sufficient information on the status of EMMP implementation for USAID to effectively fulfill its oversight and performance monitoring role.*
Use EMMP to streamline reporting

If the EMMP contains a “monitoring record” section, attach the EMMP—updated with current monitoring results—to the report.

<table>
<thead>
<tr>
<th>Design requirement</th>
<th>Incorporated in final technical specifications</th>
<th>Built-as specified? (confirmed by field inspec.)</th>
<th>Notes (Issues &amp; resolution)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Date Confirmed</td>
<td>Initials</td>
<td>Y/N</td>
</tr>
<tr>
<td>GRADING, SEPTIC &amp; DRAINAGE.</td>
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<tr>
<td>If construction results in substantially increased slope of any land within 10m of the stream, that slope must be protected with berms, plantings, etc.)</td>
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<td>Site grading and drainage shall be designed and constructed to prevent accumulation of standing water</td>
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<td>Aprons must be installed and drainage provided at water supply point(s)—no standing water allowed.</td>
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<td>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.</td>
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<td>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.</td>
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</table>

**Excerpt of EMMP with monitoring record for medium-scale construction project.**
EMMP monitoring log can simplify reporting

If the EMMP contains a “monitoring record” section, simply attach the EMMP to the quarterly or semi-annual reporting document.

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Responsible Party</th>
<th>Monitoring Scheme</th>
<th>Est. Cost</th>
<th>Monitoring Log</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td><strong>Indicators</strong></td>
<td><strong>Data source/Method</strong></td>
<td><strong>How Often</strong></td>
</tr>
</tbody>
</table>
| 3. Install & properly operate canal-level flow regulation structures | Project agricultural technician | • # 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  
• % 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 session on EMMPs
Larger projects, or those with complicated EMMPs may require more detailed reporting to create an auditable record.

- A text summary or short analysis of EMMP implementation is needed:
  - Highlight key mitigation activities underway in the reporting period;
  - Any significant issues encountered; and
  - Corrective actions/adjustments made.

- Stand-alone Environmental Compliance reports may also be warranted (e.g., quarterly or semi-annual).

Now on to requirement #2:
“Mainstreaming” environmental performance

Environmental issues can be integrated, or “mainstreamed” into the project results framework for reporting purposes.

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

What is Reporting Requirement #2 again? …

“One or more key project performance indicator(s) (project results framework) should reflect overall 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.
Bringing env. issues into 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
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 cook stoves 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
“Environmentalizing” project indicators

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
As with all other aspects of the project, the COR or AOR is the primary reviewer. But the MEO and M&E function may also be involved.
# USAID environmental compliance oversight

1. Prior review/approval of partner-developed:
   - **EMMP**
     - ensure responsive to IEE/EA conditions
   - **Project budgets and workplans**
     - ensure EMMP implementation planned and funded
   - **Project Reporting Framework**
     - ensure environmental compliance reporting requirements are met

   **Primary responsibility for ensuring IP compliance lies with COR/AOR.**
   
   MEO will also review/clear where activities are environmentally sensitive and/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 COR/AOR or M&E Officer.**
   
   **MEO should visit the most environmentally sensitive activities (REA may assist).**