

Session 21.

Bringing Curricula to Reality

Group discussion + individual action planning

Summary

This session will consist of an Action Planning exercise in which participants synthesize key elements of the technical instruction and skill building activities to identify specific ways in which they can advance environmental compliance objectives and the principles of environmentally sound design and management.

Taking Stock: the State of Environmental Compliance in USAID Mission & Projects

This workshop has set out LOP environmental compliance requirements, and how the responsibilities for fulfilling these requirements are allocated among IPs, C/AORs and MEOs. In practice, significant compliance gaps and shortfalls exist. Many of these gaps and shortfalls are rooted in inadequate compliance *systems and processes*.

That is, for compliance to be achieved in practice, it is not enough that individual USAID and IP staff understand their roles and responsibilities and master key skills; internal mission/team and project processes must be in place that support (and require) the exercise of these responsibilities.

In this first part of the session, we will examine the *AFR Best Practice Standard* to better understand the mission processes and capacities required for LOP environmental compliance. (While developed by Africa Bureau, there is nothing about these standards that are region-specific.) This session will consist of discussions and individual planning on “ways forward”—i.e., how to strengthen mission/team and IP/project compliance processes and capacities to improve LOP environmental compliance and better achieve ESDM.

Focus Groups and Individual Action Plans.

Having taken stock of where we are, we are ready to begin to discuss ways forward: how can we and our mission and projects strengthen mission and team compliance processes and capacities to improve LOP environmental compliance and better achieve ESDM?

We will divide into two focus groups: (1) Mission Staff and (2) IPs. (*Note: depending on balance of participant numbers in these two groups, a different grouping may be decided.*) Each group will engage in a facilitated discussion

Focus Group Questions:

- What elements of LOP compliance are well-implemented in your mission/project? Why?
- Have you/your team/the mission/your project implemented compliance strengthening measures you would like to share? Are they working well?
- Key LOP environmental compliance gaps within your team/Mission/project? What are the causes of these gaps?
- Do you see feasible remedies? What are they?
- What do the USAID sector teams (and A/CORs specifically) need to do differently? Do they or the projects need additional resources, support or training to implement these changes?

Plenary “Way Forward” Discussion and Individual Action Plans.

Following the focus groups, we will reconvene in plenary:

- We will begin the plenary session with a short report-out from each group.
- Then, we will have a facilitated discussion to try to reach agreement, as a group, on the following questions:

Assuming that each of us have the opportunity to deliver post-workshop briefings to Mission Management /Sector Team leaders or COPs, what are the key points to convey to prioritize and strengthen LOP environmental compliance? Key recommendations to make?

(Not all points will be applicable to all everyone, but we want to agree on a set of core messages.)

- The last portion of this session will be reserved for development of individual workshop follow-up plans, using the template on the following page. We will ask for volunteers to share some of their follow-up items.

Objective

Survey the Mission and Project compliance processes and capacities required for compliance. Identify key messages to communicate to mission management/sector team leaders (USAID staff) and COPs (IP staff) to prioritize and strengthen LOP environmental compliance.

Develop an individual plan for workshop follow-up to strengthen LOP environmental compliance in your project, team, or mission/operating unit.

Key resources

- *AFR Environmental Compliance Best Practice Standard*
- Environmental Compliance Action Plan template (both provided on the following pages.)

AFR Environmental Compliance Best Practice Standard

A) Environmental documents are in place, including:	
1) Environmental Compliance Mission Order	
2) MEO Appointment Memo	
3) Up-to-date ETOA or FAA 118/119, prepared with MEO involvement or review	
4) IEEs at SO level, updated as necessary	
5) IEEs at activity level, updated as necessary (if not included in SO-level IEE)	
B) Staff and implementing partners have capacity to ensure environmental compliance:	
1) Staff and implementing partners have been trained in Regulation 216/environmental compliance	
2) MEO has knowledge of country level environmental assessment legislation and country environmental issues	
3) MEO has skills and expertise to identify potential environmental components for Mission SOs and activities;	
4) A “Deputy” or “Alternate” MEO has been appointed to assist when the MEO is unavailable	
5) Opportunities for ongoing training in environmental compliance are provided to staff and implementing partners	
C) Processes are in place to ensure environmental compliance:	
1) MEO reports directly to Mission Director or senior management on matters pertaining to compliance with USAID Environmental Procedures	
2) MEO has mission-wide tracking process for IEE status, which is readily available to all mission staff. (BEO request: use Environmental Compliance Status Report format, an example of which is being sent as an attachment.)	
3) MEO and CTOs/Activity Managers have process for collaborating on activities with potential environmental impacts (from design to closure)	
4) Process exists to identify activities that need amended IEEs (not already covered by the SO level IEE)	
5) Process exists for ensuring IEE conditions are incorporated into Request for Proposals/Request for Applications (RFP/RFA), or process exists for ensuring activity-level IEE will be undertaken by the contractor (and included as a task in the RFA/RFP)	
6) Process exists for incorporating IEE conditions into contracts; and including mitigation and monitoring costs into project budgets	
7) Process exists for ensuring mission or implementing partner develops and implements an Environmental Management Plan/Mitigation and Monitoring Plan (EMP/MMP)	
8) Process exists for reporting to USAID on implementation of mitigation measures and continued assessment of potential environmental impacts (in project semi-annual or quarterly reports);	
9) Financial resources available to support mission environmental compliance processes, including training, analytical support, MEO travel to assist CTOs with field monitoring, etc. When the MEO reports to a sectoral team (Economic Growth, etc.), these resources would ideally be provided by the Program Office, since the MEO duties support the mission as a whole.	
D) The following mission contracting, project, and review/status documents include environmental compliance language:	
1) Strategic Objective Agreement (SOAg) approvals	3) Modified Acquisition and Assistance Request Documents (MAARDs)
2) Activity Approval Documents (AAD)	4) RFPs/RFAs
5) Contracts and cooperative agreements with budget that reflects mitigation and monitoring costs;	
6) Quarterly or semi-annual reports, submitted by project staff to the CTO	
7) Most recent Annual Report submitted by Mission to USAID/W	
8) Portfolio reviews, conducted semi-annually	
9) Closure report, where lessons learned regarding ESDM and Reg. 216 should be documented; and	



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INDIVIDUAL WORKSHOP FOLLOW-UP PLAN

With reference to previous discussions in this session, please identify 3-5 follow-up actions that you plan to take after this workshop to strengthen LOP environmental compliance on your project, in your team, or in your mission/operating unit. For each, state a proposed timeline and immediate next step.

Example actions. Actions might include (but are not limited to):

***Mission Staff:** Brief mission management on key messages identified in this session ▪ Brief contracts team on ECL and inclusion of environmental responsibilities clauses in A/COR letters ▪ Require EMMPs for projects for which you are an A/COR ▪ Deliver a short LOP Environmental Compliance Briefing for mission staff ▪ Work with M&E specialist to better assess env.compliance in field visits.*

***IPs:** Brief your COP and M&E lead on key environmental compliance requirements as conveyed by the workshop ▪ Lead an environmental compliance session ion an upcoming staff training ▪ Developing a first-draft EMMP for internal review ▪ Developing a TOR for an external consultant or requesting TA from your home office to assist with EMMP development*

Action item	Proposed timeline	Immediate step
<i>Ex. Lead Environmental Compliance Session in upcoming staff training. (Develop short presentation using slides from this workshop.)</i>	<i>3rd week of January</i>	<i>Contact training coordinator.</i>
1.		
2.		
3.		
4.		

