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Environmental Compliance Reporting

GEMS Environmental Compliance-ESDM Training Series
Senegal, February, 2014

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/AORs 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:

Preparing “an auditable record” of compliance

Environmental compliance reporting can be integrated as part of ‘regular’ project reporting

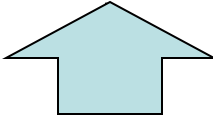
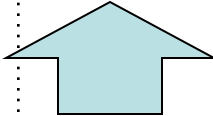
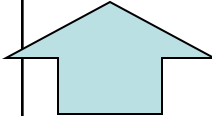
- ❖ **Quarterly or semi-annual project reports should contain a separate section addressing environmental compliance.**
- ❖ **The section must provide *sufficient information on the status of EMMP implementation for USAID to effectively fulfill its oversight and performance monitoring role.***

Any specific reporting requirements contained in the IEE must also be addressed

Title II CSs must submit an Annual Environmental Compliance Status Report

Use EMMP to streamline reporting

If the EMMP contains a “monitoring record” section, attach the EMMP—updated with current monitoring results—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	Excerpt of EMMP with monitoring record for medium-scale construction project.					
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.						

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.

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	<ul style="list-style-type: none"> • # 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

Complex EMMPs require detailed reporting

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

This intervention will NOT show good performance. . .



Bringing env. issues into 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 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



USAID review of environmental reporting



*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 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).