



# ENCAP FACTSHEET

## ENVIRONMENTAL PROCEDURES BEST PRACTICES REVIEW

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### WHAT ARE USAID'S ENVIRONMENTAL PROCEDURES?

USAID's Environmental Procedures are set out in Federal regulations (22CFR216, or "Reg. 216") and in USAID's Automated Directives System (ADS), particularly Parts 201.3.12.2.b and 204.

Compliance with these Procedures is mandatory. They apply to every program, project, activity, and amendment supported with USAID funds.

In general, these procedures specify an environmental review process that must be applied to all activities before implementation. This process may result in environmental conditions (mitigation measures) that must be:

- f integrated into procurement instruments;
- f translated into activity-specific environmental mitigation and monitoring plans; and

- f implemented and monitored over the life of the activity.

For more information, read the "[USAID Environmental Procedures Briefing for Mission Staff](#)."

### WHAT IS AN ENVIRONMENTAL PROCEDURES BEST PRACTICES REVIEW?

The Environmental Procedures Best Practices Review (BPR) is a thorough review of mission environmental compliance status, policies, procedures, and capacities. Its goal is to improve the level, effectiveness and efficiency of Mission compliance with USAID's Environmental Procedures, and to better integrate compliance into normal Mission operations.

The BPR identifies strengths and gaps in a Mission's application of USAID's Environmental Procedures with reference to Africa Bureau's [Mission Environmental Compliance Best Practice Standards](#). This includes assessing the extent to which:

- f Required Reg. 216 environmental review documentation [Categorical Exclusions, Initial Environmental Examinations (IEEs), and Environmental Assessments (EAs)] is in place for existing activities and "in pipeline" for planned activities;
- f Mission and project staff understand their roles and responsibilities related to the Procedures;
- f Mission and project staff capacity to implement the Procedures is adequate or staffing and training needs have been identified and plans have been made to address them;
- f Procurement instruments reflect IEE and EA conditions;
- f Environmental mitigation and monitoring measures

specified by IEEs and EAs are implemented; and

- f Environmental compliance is integrated into partner reporting.

The key output is a *BPR Report and Action Plan* which provides the results of this assessment and sets out recommended actions to address key gaps in compliance and compliance capacity.

## WHY SHOULD A MISSION CONDUCT A BPR?

Experience shows that Missions often do not consistently or effectively apply USAID Environmental Procedures over the full project lifecycle. Among others, common gaps in compliance include:

- f Objective- and project-level IEEs that inadequately address the specific activities being implemented;
- f IEEs or EAs with conditions (mitigation measures) that are not being implemented, monitored, or reported on;
- f Procurement instruments that fail to incorporate environmental compliance requirements;
- f Project workplanning and budgeting processes that fail to develop an environmental mitigation and monitoring plan (EMMP) responsive to IEE/EA conditions, and/or fail to budget for EMMP implementation; and
- f Mission and project staff unaware of their environmental compliance roles and responsibilities.

BPRs were recently endorsed by the Assistant General Counsel for Africa in recommendations to the AA/AFR as a key means of assuring effective implementation of risk management measures needed in Indoor Residual Spray (IRS) programs, particularly those using DDT.

## WHO CONDUCTS A BPR?

The BPR is conducted by an external facilitator, a mission counterpart (the MEO or designee), and the Regional Environmental Advisor (REA), who participates for at least part of the in-mission segment.

The roles of each are described below.

## WHAT IS THE BPR METHODOLOGY?

The BPR facilitator first conducts a desk review of key documentation (see box at right).

This is followed by interviews with Team Leaders, Cognizant Technical Officers (CTOs), the Program Officer, Contracting Officer, Legal Advisors, and other key Mission staff. The interviews are structured around a field-tested BPR questionnaire.

Where projects have EAs or complex IEE conditions, the facilitator will interview selected partner staff and may conduct field visits.

The process is summarized in the diagram below.

**BPR Facilitator timeline**



The BPR takes about 22 days of facilitator LOE: four days for desk review of Mission documents and advance correspondence; two days travel; eight days conducting interviews at the Mission and with target partner staff; three days site visits, two days to develop, prepare and deliver a staff briefing on draft findings and recommendations, and three days to produce the final Report and Action Plan. REA support may shorten this time; remote sites and large/complex portfolios may extend it.

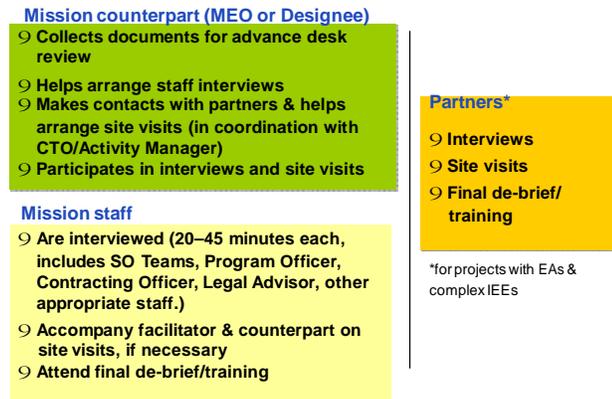
At the end of the in-mission portion of the BPR, the facilitator and the MEO will debrief mission management (and potentially Mission staff more broadly). They may also provide a short training on life-of-project environmental compliance. Partners may be involved in the briefing or training.

### Documentation reviewed during a BPR

- MEO appointment memo
- Mission Order on environmental compliance
- Reg. 216 Environmental Documentation (Categorical Exclusions, IEEs, EAs)
- Project Quarterly/Semi-Annual Reports; SO Team Semi-Annual Portfolio Review documents & Annual Reports
- Activity Approval Documents & Procurement Plan
- Mission Training Plan
- Current 118/9 Assessment

## WHAT IS THE MISSION AND PARTNER ROLE IN THE BPR?

The BPR involves a number of Mission Staff. Where projects have EAs or complex IEEs, partners are involved as well. Mission and Partner participation and contributions are summarized in the diagram below.



## WHAT ARE THE OUTPUTS OF THE BPR?

At the end of the BPR, the facilitator will draft a *BPR Report and Action Plan*. This document will:

- identify all Categorical Exclusions, IEEs, and EAs currently in force, and determine gaps in coverage;
- characterize the extent to which IEE and EA conditions are being implemented and monitored;
- evaluate capacity of Mission and project staff to apply USAID’s Environmental Procedures, and recommend training as necessary;
- evaluate environmental compliance-related Mission guidance (Mission Order on Environmental Compliance, MEO Appointment Memo, etc.), and recommend areas that can be strengthened as necessary;
- identify procedures and processes at the Mission, sector, and activity levels where environmental compliance should be incorporated, systematized, or strengthened, and recommend improvements;
- strengthen field-based tracking and monitoring of implementation of IEE/EA conditions by Mission and Project staff; and
- help the Mission to identify locally-based technical support in environmental compliance and environmentally sound design and management, if necessary.

## WHAT IS EXPECTED OF THE MISSION ONCE THE BPR IS COMPLETED?

Any gaps in Reg. 216 documentation coverage identified by the *BPR Report and Action Plan* must be corrected per 22 CFR 216. Failures to implement IEE/EA conditions must also be corrected.

The Mission is not obligated to implement other Action Plan recommendations. However, the recommendations are intended to be practical and are meant to strengthen project outcomes.

## WHAT RESOURCES ARE AVAILABLE TO ASSIST WITH BPRS?

The following resources are available to help Missions to implement the BPR process and to minimize the burden on Mission staff:

### **Regional Environmental Advisor (REA) Support.**

REAs participate in at least part of the in-mission segment of all BPRs. They may also be available to provide BPR coordination or additional technical support.

**AFR/SD ENCAP technical support.** Africa Bureau’s ENCAP program ([www.encapafrika.org](http://www.encapafrika.org)) is available to provide BPR facilitators and technical assistance to support Action Plan implementation. ENCAP resources are typically provided on a mission cost-share basis. ENCAP support is accessed via request to the REA.

**Other External resources:** Using its own resources, the Mission may contract directly with a consultant to serve as the BPR facilitator and to provide TA to implement the Action Plan. Ideally, such support would be local and therefore more available for follow-up support. AFR/SD and ENCAP can help identify international consultants, as needed, and can provide assistance with Scopes of Work.