



**USAID**  
FROM THE AMERICAN PEOPLE



# IP Environmental Compliance Reporting

GEMS Environmental Compliance-ESDM Training Series  
Uganda, September, 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**

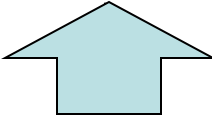
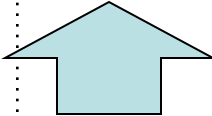
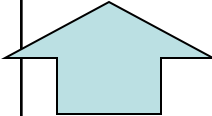
- ❖ **Quarterly or semi-annual project reports should contain a separate section addressing environmental compliance.**
- ❖ **The section must provide *sufficient information on the status of EMMP implementation for USAID to effectively fulfill its oversight and performance monitoring role.***

**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 |   |
| <b>Design requirement</b>  |  |          |  |                    |          |   |
| <b>GRADING, SEPTIC &amp; DRAINAGE.</b><br>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  | <b>Excerpt of EMMP with monitoring record for medium-scale construction project.</b> |          |  |                    |          |   |
| 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"> <li>• # of doors and other flow-control structures installed</li> <li>• % of Ha. under flow control</li> <li>• % of secondary &amp; tertiary canals showing significant erosion damage after each growing season</li> </ul> | Reports<br>Field visit   | Quarterly         |           |                |        |           |
| 4. Protect upper slope with fruit (mangoes, citrus, avocado) and forest trees | Project agricultural technician | <ul style="list-style-type: none"> <li>• # of trees planted and survived</li> <li>• % of at-risk upper slope land protected</li> <li>• total m3 of sediment removed from canals over each rainy season.</li> </ul>   | Reports<br>Field visit<br>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:

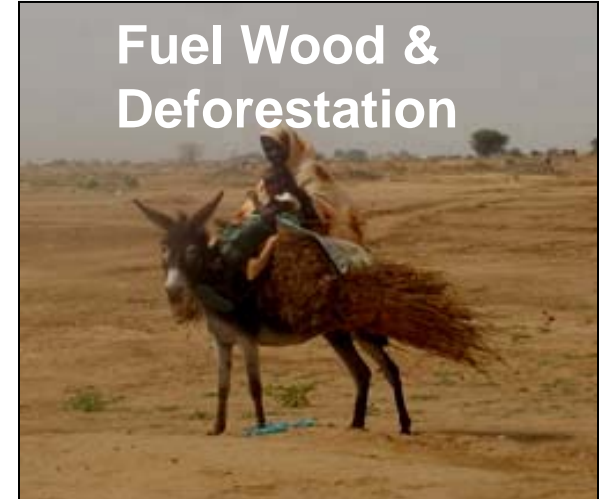
Improved cook stoves and cooking practices

### 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***

## Fuel Wood & Deforestation



# “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).