



USAID Environmental Procedures



Overview

- ◆ USAID environmental review requirements are:
 - ◆ A specific example of the general EIA process
 - ◆ Defined by “Regulation 216” (22CFR216)
- ◆ Requirements apply to:
 - ◆ All new USAID programs or activities.
 - ◆ Substantive amendments or extensions to ongoing activities



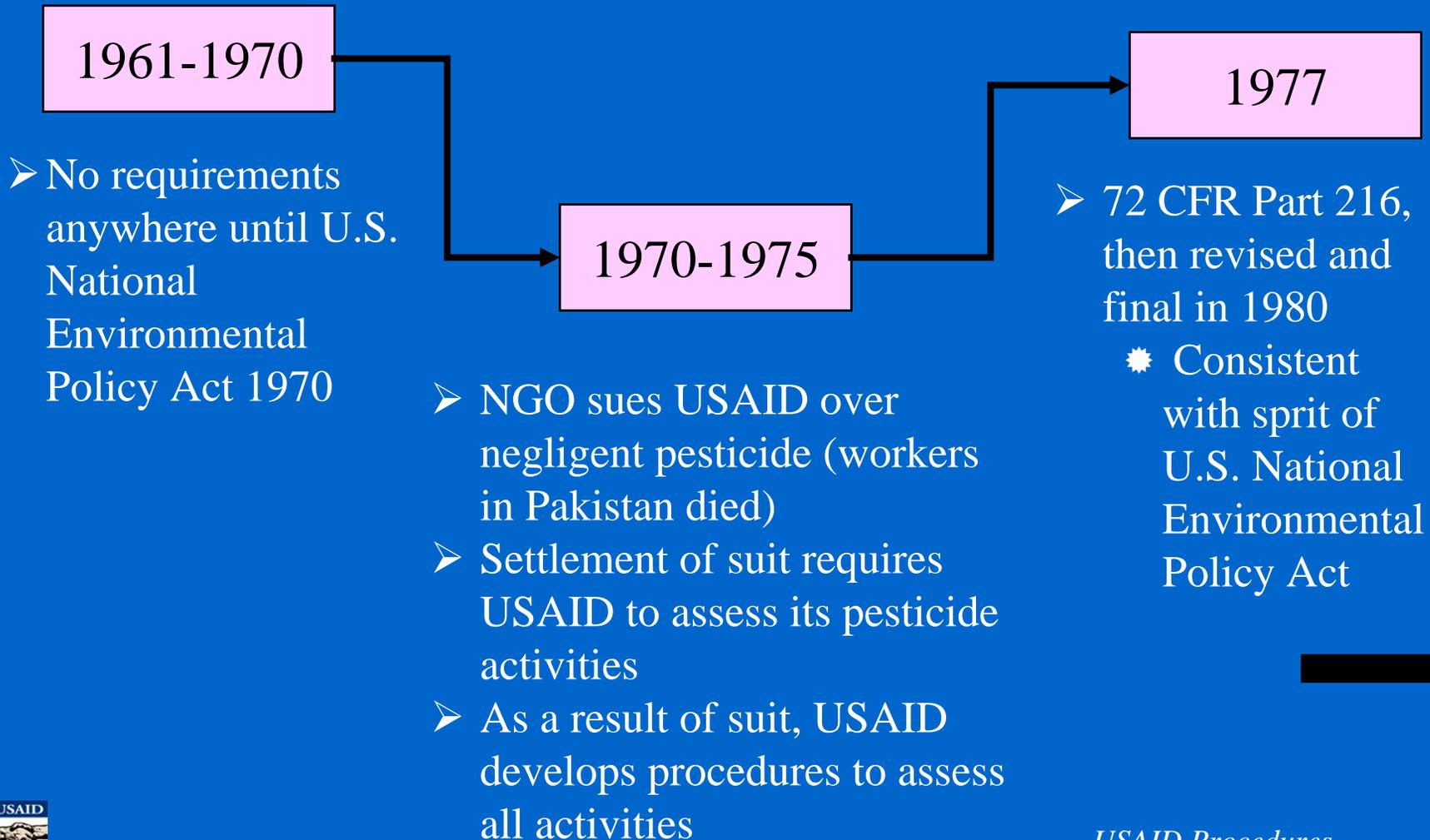
Overview

◆ Purpose:

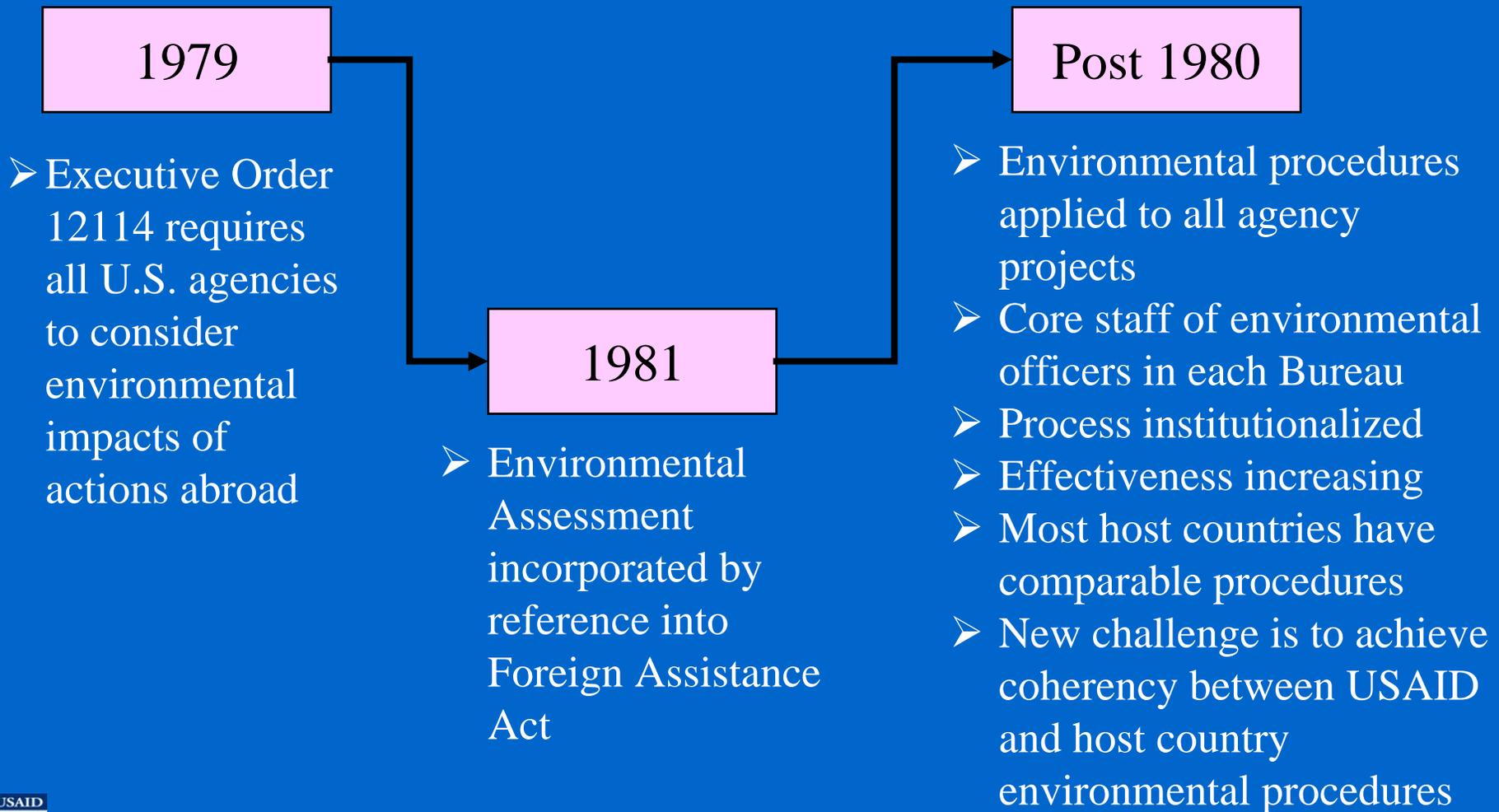
- ◆ Legal obligation to implement NEPA
- ◆ More sustainable projects through EIA:
 - ➔ Consider “reasonably foreseeable” environmental consequences prior to making decisions;
 - ➔ Ensure that appropriate environmental safeguards are adopted—both to protect public health and the renewable resource base on which sustained development depends;
 - ➔ To prevent project failure from environmental causes;



Origin and timeline



Origin and timeline (cont'd)



Review: the EIA Process

Phase I

Phase II

Screening
Based on the nature of the activity/project, what level of environmental scrutiny is indicated?

Understand the proposed activity

May or may not require a full EIA, but further scrutiny is indicated

Preliminary Assessment
A rapid, simplified EIA study using simple tools

Decision: Conduct full EIA?

YES
(significant adverse impacts are possible)

NO
(project is very unlikely to have any significant adverse impacts)

Scoping
Determines issues and impacts addressed by the full EIA study

By its nature, project is very unlikely to have any significant adverse impacts

EIA Process ends

Activity demands a full EIA automatically

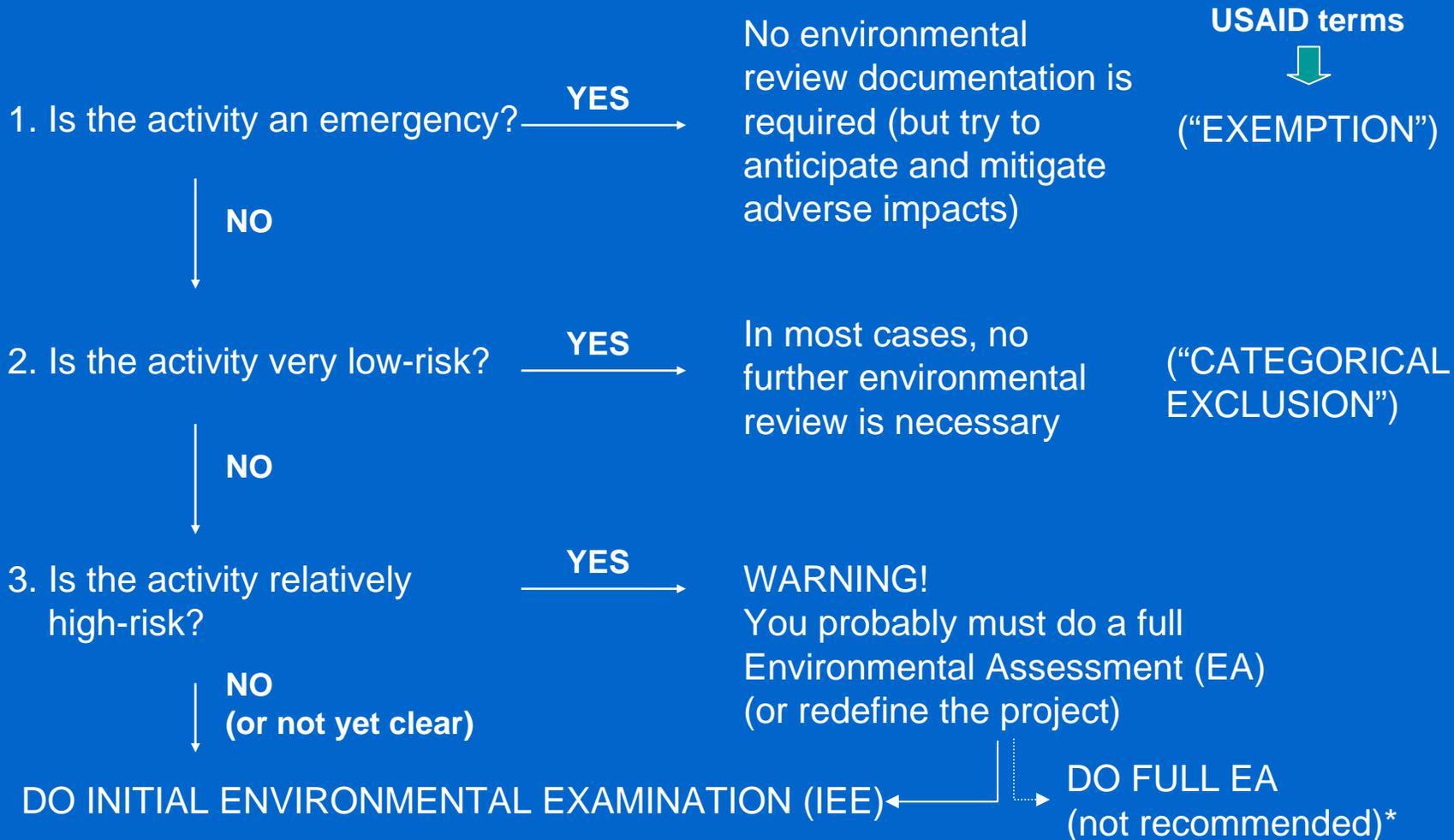


How to start

- ◆ Note: theory is presented now; opportunity for practice comes later
- ◆ 1. List all activities in a project
- ◆ 2. For each activity, do screening



Screening under Reg. 216



USAID Definitions

- ◆ How does USAID define an “EXEMPTION” (= “emergency”)?
 - ◆ International disaster assistance:
 - ◆ Other emergency situations
 - ➔ requires Administrator (A/AID) or Assistant Administrator (AA/AID) formal approval
 - ◆ Circumstances with “exceptional foreign policy sensitivities”
 - ➔ requires A/AID or AA/AID formal approval.



USAID Definitions

- ◆ How does USAID define a “CATEGORICAL EXCLUSION” (=“low-risk activity”)?
 - ◆ Education, training or technical assistance;
 - ◆ Limited experimental research
 - ◆ Analysis, studies, workshops, meetings;
 - ◆ Documents or information transfer;
 - ◆ General institutional support.



USAID Definitions

- ◆ Categorical exclusions (continued)
 - ◆ Capacity building for development;
 - ◆ Activities that involve the application of USAID approved design criteria.
 - ◆ Nutrition, health, population and family planning activities (except for construction)
 - ◆ Support to intermediate credit institutions if USAID does not review or approve loans



USAID Definitions

◇ Categorical exclusions also include situations in which USAID has no direct control:

- ◆ Commodity Import Programs (CIPs), when USAID has no knowledge of or control over use;
- ◆ Support to intermediate credit institutions if USAID does not review or approve loans;
- ◆ Projects where USAID is a minor donor
- ◆ Food for development programs under Title III, when USAID has no specific knowledge or control;
- ◆ Grants to PVOs where USAID has no specific knowledge or control



USAID Definitions

◆ NO CATEGORICAL EXCLUSIONS ARE POSSIBLE FOR PESTICIDES



USAID Definitions

◆ When does USAID usually require a full Environmental Assessment?

- ◆ Irrigation or water management including dams
- ◆ Agricultural land leveling & Drainage
- ◆ Large scale agricultural mechanization
- ◆ New land development
- ◆ Resettlement
- ◆ Penetration road building or road improvement

AND . . .



USAID Definitions

◆ Full EAs (continued)

- ◆ Power plants
- ◆ Industrial plants
- ◆ Potable water and sewage, unless small scale (Size limit?)
- ◆ Activities jeopardizing endangered and threatened plant and animal species and critical habitat
- ◆ Pesticides (require an IEE at least, often an EA).
- ◆ Activities in undegraded tropical forest



Screening—review

USAID terms



(“EXEMPTION”)

1. Is the activity an emergency? **YES** →
↓ **NO**

No environmental review documentation is required (but try to anticipate and mitigate adverse impacts)

2. Is the activity very low-risk? **YES** →
↓ **NO**

In most cases, no further environmental review is necessary

(“CATEGORICAL EXCLUSION”)

3. Is the activity relatively high-risk? **YES** →
↓ **NO (or not yet clear)**

WARNING!
You probably must do a full Environmental Assessment (EA) (or redefine the project)

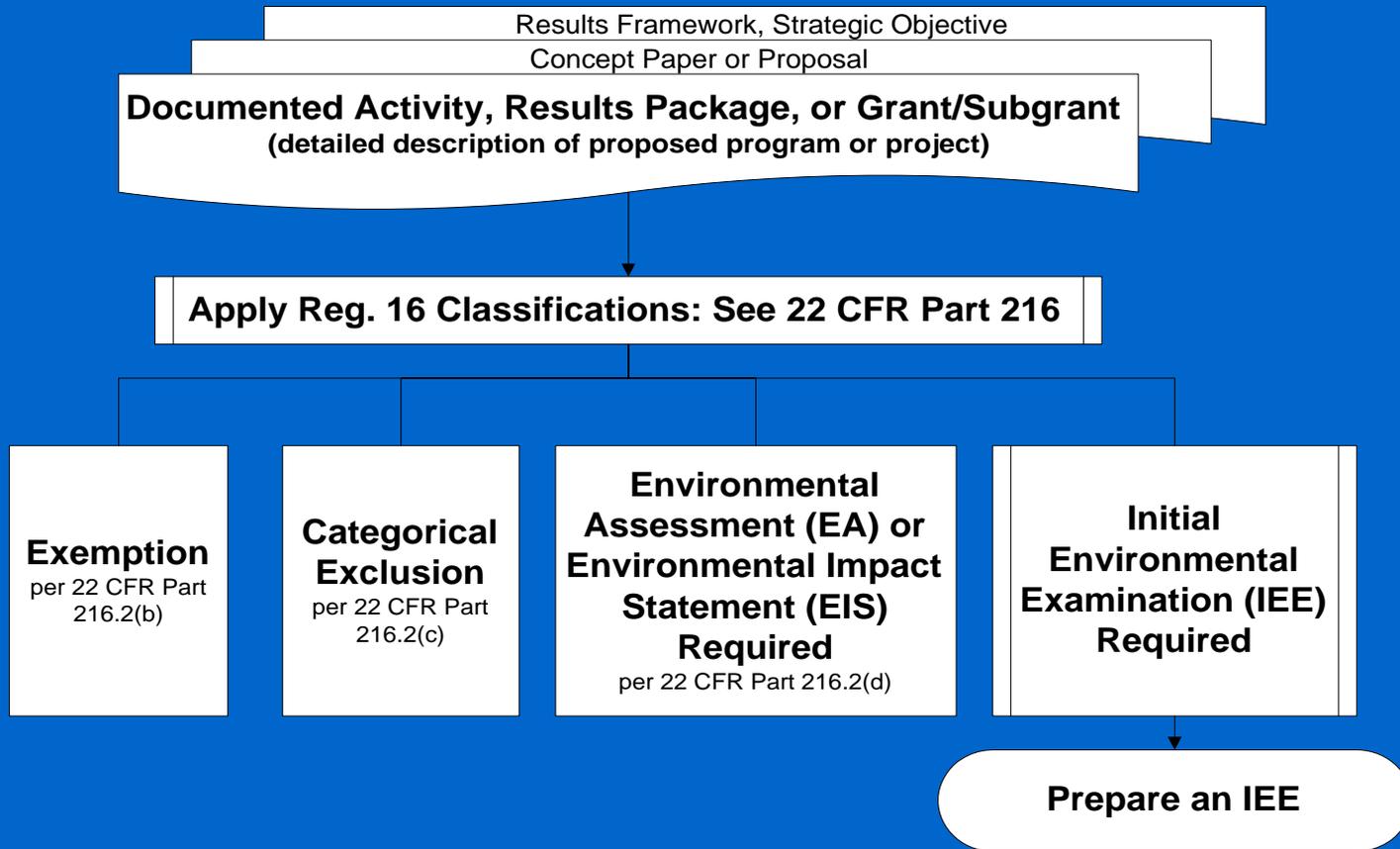
DO INITIAL ENVIRONMENTAL EXAMINATION (IEE) ←

DO FULL EA (not recommended)*

USAID Procedures

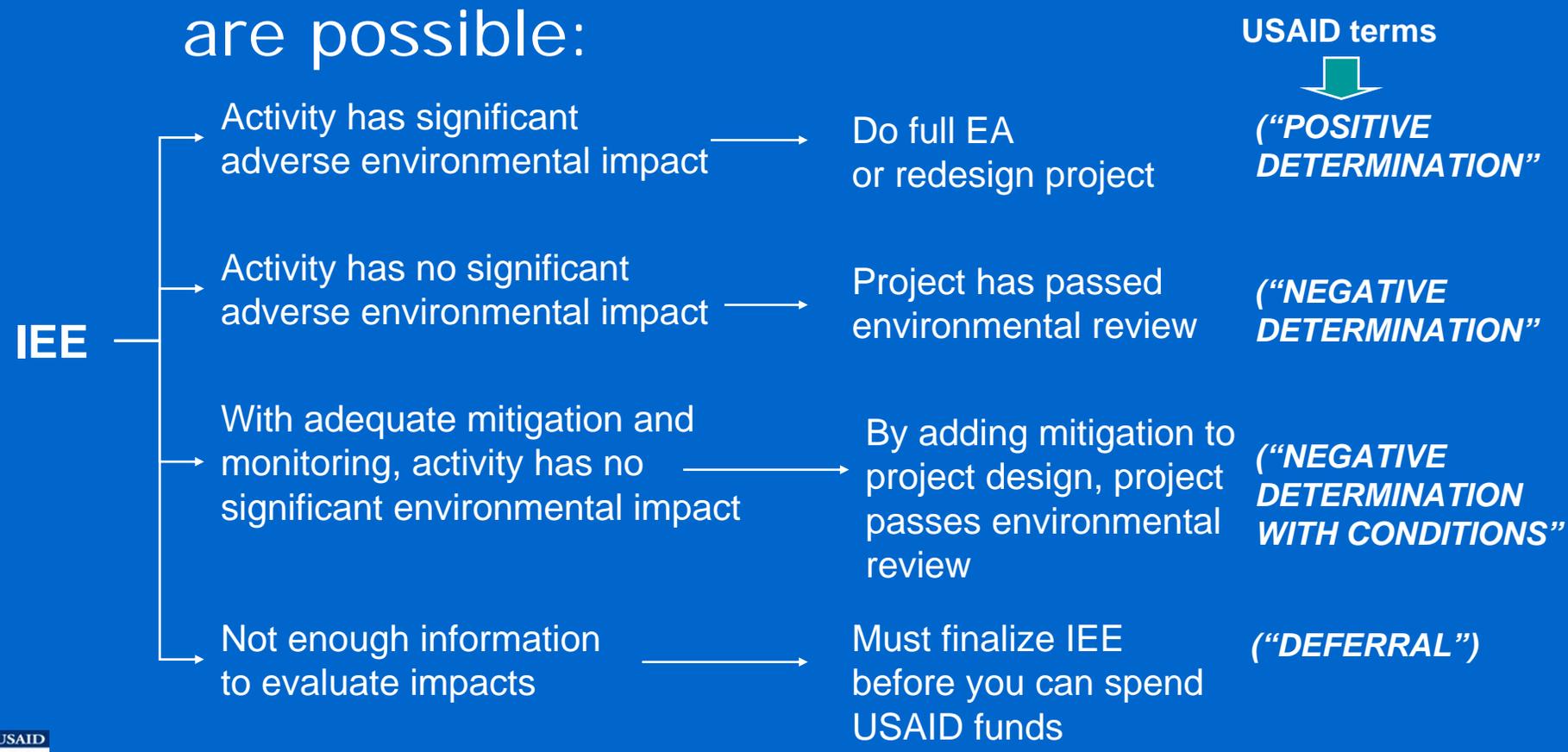


Screening process w/ USAID vocabulary



Initial Environmental Examination

◆ For each activity covered, 4 outcomes are possible:



What does an IEE look like?

◆ Basic IEE Outline:

- ◆ 1. Goals and purpose of project; listing of activities
- ◆ 2. Baseline information
- ◆ 3. Evaluation of potential environmental impacts
- ◆ 4. Recommended findings & mitigations
- ◆ 5. Summary



How does the IEE process work?

- ◆ Submit IEE or categorical exclusion form with project proposal
- ◆ IEE contains your DRAFT FINDING:
 - ◆ Positive determination
 - ◆ Negative determination
 - ◆ Negative determination w/ conditions
 - ◆ Deferral
- ◆ USAID may accept or reject this finding, or require more analysis

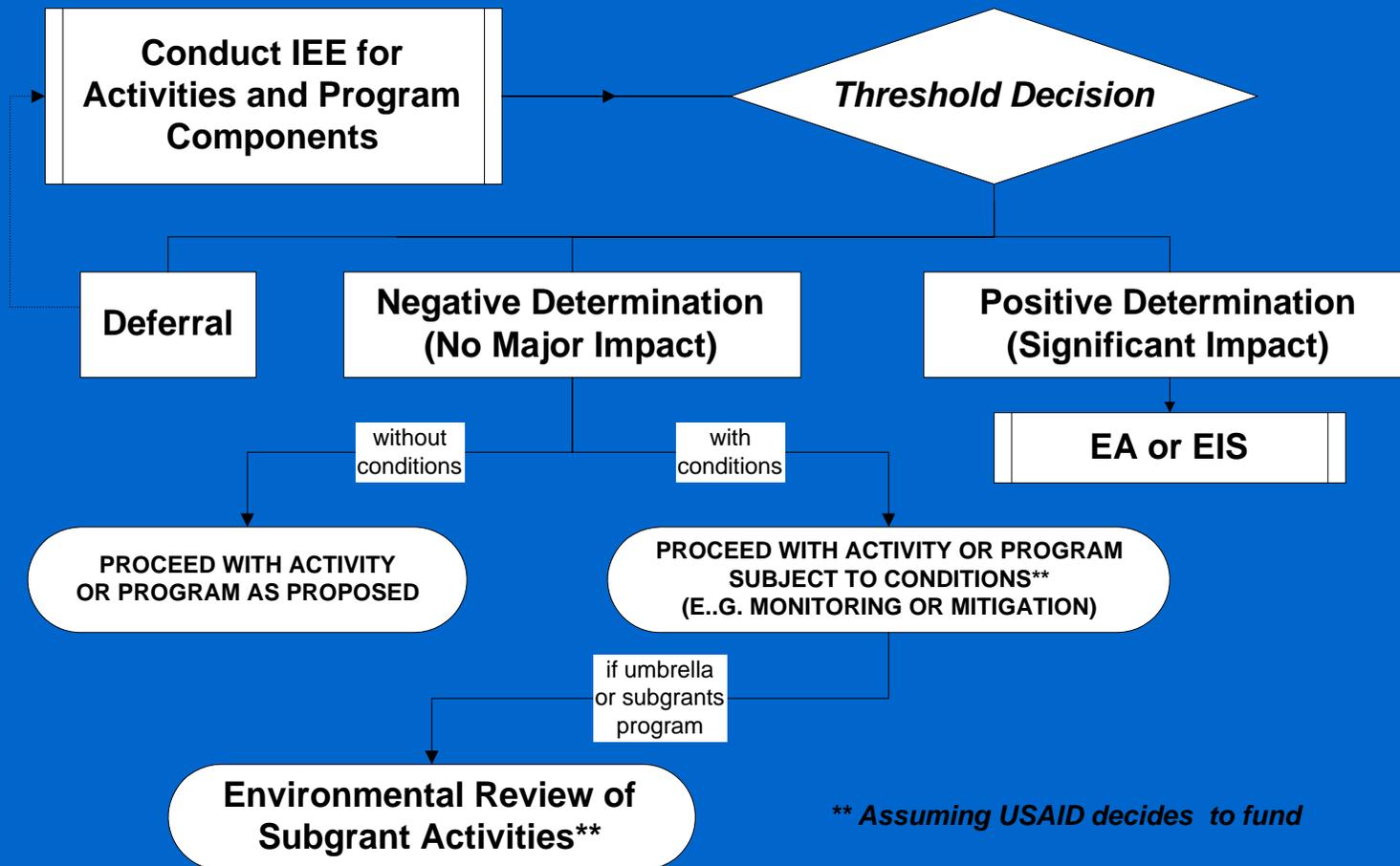


How does the IEE process work?

- ◆ Also, an Environmental Status Report is submitted each year for ongoing projects (Title II only).



IEE process w/ USAID vocabulary



How to avoid rejection/delay of proposals on environmental grounds

- ◆ Be aware of USAID's definitions of "high-risk" activities
- ◆ BE PROACTIVE—Include environmental monitoring and mitigation plan in project proposal
 - ◆ Especially important for "high-risk" activities



Making environmental procedures effective

- ◆ Purpose of USAID's environmental procedures is to assure environmentally sound design
- ◆ Paperwork alone is not sufficient
- ◆ Also required:
 - ◆ Capacity-building in EA/ESD
 - ◆ Development and application of host country environmental policies;
 - ◆ Effective project monitoring programs within USAID and its partners

