

# Implementation Tips for USAID Partners

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## Definitions

### Environmental Impact Assessment

**(EIA)**—A systematic process to identify potential effects—positive or negative—that a project or activity may have on the environment. It includes establishing plans to monitor and mitigate any negative effects as well as ways to prevent activities that are likely to cause significant environmental harm.

### Initial Environmental Examination

**(IEE)**—A survey of reasonably foreseeable effects of a proposed project or activity on the environment. It is a simplified version of a more comprehensive examination of environmental impacts called the Environmental Assessment.

### Environmental Assessment (EA)

—A detailed environment analysis that is necessary when an initial review of the program indicates that at least some program activities are likely to have a significant adverse effect on the environment.

### Environmental Mitigation Plan (EMP)

—Often included in the IEE, the EMP (sometimes called an Environmental Mitigation & Monitoring Plan [EMMP]) is a document that identifies potential environmental impacts of program activities and lays out a specific plan to monitor any negative impacts as well as the methods chosen to diminish them.

### Environmental Status Report (ESR)

—An annual report submitted to USAID examining a project's impact on the environment and describing what the organization has done to comply with its EMP.

## USAID Environmental Requirements: Environmental Impact Assessment

**Q.** What environmental compliance assessment and/or documentation is our organization required to complete to comply with USAID regulations?

**A.** Every USAID-funded program is required to comply with the U.S. Government's (USG's) environmental regulations (often referred to as "Reg. 216"). Reg. 216 outlines the Environmental Impact Assessment (EIA) process that USAID has designed to identify potential effects—positive or negative—that a project or activity may have on the environment. The process is intended to prevent activities from taking place that are likely to cause significant environmental harm and to ensure that projects monitor and mitigate any negative effects on the environment. (For more information, see Title 22 of the Code of Federal Regulations and the administrative guidelines in Chapter 204 of USAID's Automated Directives System.)

Although USAID will sometimes conduct significant portions of the EIA process, an organization is typically responsible for assessing its project's compliance with Reg. 216 and submitting verification for USAID approval. This article will help you understand the EIA process and what you need to do to comply with USAID's regulations.

### Scope of an Environmental Impact Assessment

To begin the EIA, your organization must screen all proposed activities for a project. During this initial screening, program activities are divided into four categories:

- *Exempt*
- *Categorical Exclusion*
- *Initial Environmental Examination (IEE) Required*
- *IEE Required & High Risk*

The requirements and scope of your EIA depend largely on the category/categories under which your proposed activities fall.

## References

- Mission-specific requirements and preferences for demonstrating Reg. 216 compliance may vary. Ensure that you prepare documents using the preferred approach and format and contact the Mission before beginning the documentation process.
- USAID is ultimately responsible for ensuring that an IEE is completed. In some cases, USAID will complete the IEE. In other cases, the partner organization will be responsible for completing the IEE.

## Items for Consideration

- [Title 22 of the Code of Federal Regulations Part 216 \(Reg. 216\)](#)
- [USAID ADS Chapter 204](#)
- [Environmentally Sound Design and Management for Partners and Programs in Africa: USAID Environmental Procedures Training](#)

## Exempt

A small portion of USAID's activities are exempt from environmental documentation. These are generally limited to international disaster or emergency relief activities; however, exemptions may be provided under other special circumstances. If all your program activities are exempt, you will not need to provide environmental documentation to USAID.

## Categorical Exclusion

USAID considers some types of activities to have such a low risk of adversely affecting the environment that they are categorically excluded from environmental review. Examples include: community awareness training, studies and information transfers. For a complete list of categorically excluded activities, see Reg. 216.2(C)(iii). If all of your program activities fall under this list, contact your Mission to request the appropriate exemption forms.

## IEE Required

If any of your program's activities are not exempt or categorically excluded, an IEE should be conducted. An IEE is a review of the reasonably foreseeable effects of a proposed project or activity on the environment.

USAID uses the IEE as the factual basis to decide whether to:

- require a more comprehensive analysis of the potential environmental impacts (called an Environmental Assessment [EA] by USAID); or
- proceed with the program using the plans to address and monitor any detrimental effects on the environment outlined in the Environmental Mitigation Plan (EMP), which is submitted with the IEE.

Please see below for how to conduct an IEE.

## IEE Required and High Risk

USAID considers some types of activities to have such a high risk of adversely impacting the environment that those activities automatically trigger an Environmental Assessment. An EA is a detailed study of the reasonably foreseeable significant effects, both beneficial and adverse, of a proposed action on the environment of a foreign country or countries. Examples of such activities include: large-scale agricultural mechanization, use of pesticides and new land development. For a complete list of activities that always require an EA, see Reg. 216.2(d)(iii).

## Preparing the Documentation

Find plain language instruction on how to prepare the necessary documentation to comply with environmental regulations, from initial screening to impact monitoring, in the USAID Environmental Procedures Training Manual, produced by Environmentally Sound Design and Management for Partners and Programs in Africa (ENCAP).

Sector by sector guidance for preparing documentation can be found here.

***It is in your interest to complete the EIA process as soon as possible... USAID requires an IEE or a Categorical Exclusion Request to be submitted along with proposal.***

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## Capacity to Conduct an Environmental Impact Assessment

Using publicly available resources and sector-specific guidance, such as the material available at: <http://www.encapafrika.org>, implementing partners normally can conduct the initial screening of their programs and an IEE on their own. Should your program require an EA, you will most likely need to hire an expert to conduct that detailed scientific study. You should plan for the expense of an EA when preparing your proposal budget if you believe you will need to conduct one.

## Environmental Impact Assessment Submission and Review Process

**A typical USAID EIA process proceeds in the following manner:**

- The implementing partner conducts an initial screening of all of its activities.
- Unless all of the activities are exempt, the implementing partner submits a draft IEE or categorical exclusion request to the Mission. (Typically, the Mission Environmental Officer [MEO] is responsible for reviewing the documentation. If your Mission does not have an MEO, you should ask the Mission to whom you should send the documents.)
- The MEO may suggest revisions before he or she sends the documents to the Regional Environmental Officer (REO) and/or Bureau Environmental Officer (BEO) for approval.
- If the IEE indicates that your activities will have significant adverse impacts on the environment and you are not able to mitigate those impacts, the REO/BEO is likely to require an EA. He or she may also recommend changes to the EMP or other portions of the IEE.
- In most cases, the IEE will be sufficient, and an EA will not be required. If an EA is not required, and you have made any necessary changes to the IEE and EMP, the REO/BEO will approve your plan and your project can begin.

## For More Information

For this or other issues of *Implementation Tips*, please visit [www.NGOConnect.net](http://www.NGOConnect.net). The Web site is a dynamic and interactive portal dedicated to connecting and strengthening CSOs, networks and CSO support organizations worldwide.

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## Compliance under an Umbrella IEE

If a USAID-funded project has many small-scale activities that will be carried out by subgrantees not yet selected when USAID awards the funding to the prime recipient, an umbrella IEE may be used to expedite the compliance process. Under an umbrella IEE, subgrantees complete a condensed environmental review process. For more information on how to conduct this type of environmental review, see ENCAP's website.

Both prime recipients and subrecipients should keep in mind that USAID environmental regulations, just like other parts of the U.S. Code of Federal Regulations, flow down to all parties receiving USAID funds to carry out projects.

## Obligations during Program Implementation

Your responsibility to comply with USAID's environmental regulations does not end when your program begins. On an annual basis, you must complete an Environmental Status Report (ESR), detailing your project's impact on the environment, including how you monitored and complied with your mitigation plan. Based on the findings in your ESR, you may need to amend your approved environmental documentation.

In addition, since USAID requires that all proposed activities comply with its environmental regulations before the activities can be funded, your project will need to seek approval to modify any current activities or add new ones.

