USAID ENVIRONMENTAL PROCEDURES TRAINING MANUAL

for
USAID Environmental Officers and
USAID Mission Partners

ANE Edition:
March 2002

USAID

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Acknowledgements and history

This *Environmental Procedures Training Manual* (EPTM) draws extensively on an earlier publication, the *Environmental Documentation Manual for Title II Cooperating Sponsors* (EDM). The EDM was developed with leadership from USAID's Africa Bureau and the Environmental Working Group of Food Aid Management (FAM), in collaboration with the Office of Food for Peace (BHR/FFP). The goal of the EDM was to make easier the tasks of understanding and complying with USAID environmental regulations for USAID Missions and Partners engaged in Title II activities.

The draft EDM was issued in November 1997, and revised after use in a regional training course in December 1997. The EDM was field tested in Environmental Assessment training courses for USAID P.L.480 Title II Cooperating Sponsors implementing food-aided development programs. These courses were held in Ethiopia, Ghana, Cape Verde, Kenya, Mozambique, Honduras, Bolivia and Mali. The EDM was published in final form in February 1999.

Charlotte Bingham was the primary author of the original Environmental Documentation Manual. At the time she was the Regional Environmental Officer (REO) for USAID's Regional Economic Development Services Office for East and Southern Africa (REDSO/ESA) based in Nairobi, Kenya. With co-author Walter Knausenberger, she was a lead organizer and trainer in the Africa Bureau's Environmental Capacity Building (ENCAP) initiative. A central part of ENCAP's program is building capacity within USAID partner organizations in environmentally sound design and Regulation 216 compliance.

Dr. Knausenberger also had much to do with the creation of the Environmental Capacity Building Program for Africa (ENCAP), the production of the Africa *Bureau's Environmental Guidelines for Small Scale Activities in Africa,* and the initiative that led to the development of the EDM.

Mr. Wes Fisher, a natural resources specialist and trainer from Tellus Institute, was the third original co-author. His work was funded under ENCAP via the EPIQ Indefinite Quantity Contract.

Based on the experience with the EDM, a decision was made to create this more general handbook for use by a broader audience of both USAID Missions and their partner organizations working in the field. Tellus was tasked to modify the EDM with primary funding from the Bureau for Asia and the Near East, and additional support from the Africa and Europe and Eurasia bureaus. In addition to field training experiences using the EDM, this revision drew on FAM and BHR/FFP review of the quality of DAP/PAA environmental documentation submissions in 1998, as well as on comments solicited from Title II CSs' on their experience in using the EDM and preparing their environmental documentation.

For their encouragement and guidance, we are indebted to the Agency Environmental Coordinator, James Hester, and Bureau Environmental Officers Paul des Rosiers (BHR and Global), John Wilson (Asia/Near East), Carl Gallegos (Africa), Jeffrey Goodson (Europe and Eurasia), Carl Maxwell (Europe and Eurasia) and Mohammed Latif (Europe and Eurasia).

Acronyms and Abbreviations

AFR	Bureau for Africa (USAID)
ANE	Bureau for Asia and the Near East (USAID)
BEO	Bureau Environmental Officer
BHR/FFP	Bureau for Humanitarian Response, Office of Food for Peace (USAID)
BDCHA	Bureau for Democracy, Conflict and Humanitarian Assistance (replaced the Bureau of Humanitarian Response in Jan 2002.)
CE	Categorical Exclusion
CFR	Code of Federal Regulations
CFW	Cash for Work
CITES	Convention on the International Trade in Endangered Species
CSs	Cooperating Sponsors (PVOs & NGOs) programming food aid
DAP	Development Activity Proposal
EA	Environmental Assessment
E&E	USAID Europe and Eurasia Bureau
EDG	Environmental Decision Guide
EDM	Environmental Documentation Manual
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EPIQ	Environmental Policy and Institutional Strengthening Indefinite Quantity Contract (USAID-funded Consortium initiated Oct. 1996)
ESA	Eastern and Southern Africa
ESR	Environmental Status Report
EWG	Environmental Working Group
FAA	Foreign Assistance Act
FAM	Food Aid Management (association of PVOs using food aid in international development and relief programs, funded by USAID/BHR/FFP)
FAO	Food and Agriculture Organization
FFP	Office of Food for Peace, USAID/BDCHA

FFW	Food-for-Work
FY	Fiscal Year
GIS	Geographic Information System
ha	hectares
IEE	Initial Environmental Examination
IPM	Integrated Pest Management
IR	Intermediate Result
IUCN	International Union for the Conservation of Nature
LAC	USAID Bureau for Latin America and the Caribbean
LOP	Life-of-Project funding
M&E	Monitoring and Evaluation
MEO	Mission Environmental Officer (USAID)
MOA	Ministry of Agriculture
ND	Negative Determination
NEAP	National Environmental Action Plan
NGO	Non-Governmental Organization
NRM	Natural Resources Management
OFDA	Office of Foreign Disaster Assistance (USAID/BDCHA)
PAA	Previously Approved Activity (USAID Title II)
PEA	Programmatic Environmental Assessment
P.L. 480	Public Law 480—Agricultural Trade Development and Assistance Act of 1954 providing for assistance in the form of food commodities
PRC	Project Review Committee
PVO	Private Voluntary Organization (in USAID usage, applies mainly to USAID funded non-governmental organizations)
REDSO	Regional Economic Development Support Office (USAID)
Reg. 216	Informal short form of USAID's Environmental Procedures, 22 CFR Part 216. Also Regulation 216 or sometimes colloquially referred to as "Reg. 16"

REO	Regional Environmental Officer (USAID)
SO	Strategic Objective
SOW	Scope of Work
TA	Technical Assistance
(Title II)TII	One of the main provisions of P.L 480 applying to food aid programmed by PVOs
U.N.	United Nations
UNCED	United Nations Conference on Environment and Development
UNHCR	United Nations High Commission for Refugees
U.S.	United States
USAID	U.S. Agency for International Development
USEPA	U.S. Environmental Protection Agency
WFP	World Food Program(me)

Chapter 1. Introduction

1.1. Background and purpose

USAID's Environmental Procedures[1] (known as Regulation 216 or Reg. 216) were formulated to:

- ensure that environmental consequences of USAID-funded activities are identified and considered in the design and implementation of activities prior to final decisions to proceed;

- assist countries in strengthening their environmental evaluation capabilities;

- define limiting environmental factors that constrain development; and

- identify activities that can assist in sustaining or restoring the natural resource base.

The procedures apply to **all** new projects, programs, or activities authorized or approved by USAID. They also apply to substantive amendments or extensions of ongoing projects, programs, or activities. Thus under Regulation 216, nearly all projects and programs require some form of environmental documentation. The documentation is an integral part of the program or project proposal; **no "irreversible commitment of resources" can take place until the environmental documentation is approved by USAID**.

Implementing organizations typically have primary responsibility for developing the documentation. These organizations know their activities and local environment better than anyone else and are best suited to develop the documentation, and to determine appropriate mitigation and monitoring measures.

This Environmental Procedures Training Manual (EPTM) has been developed specifically to assist USAID Missions and their partners in designing environmentally sound development activities and in bringing their activities into compliance with USAID Environmental Procedures. The manual may also be useful for NGOs and PVOs carrying out development activities with other sources of support.

Under Reg. 216:

- ➢ *Nearly all proposed activities require environmental documentation*

- ➢ *No irreversible commitment of resources can occur until this documentation is approved*

- ➢ *The implementing organization typically has primary responsibility for developing this documentation, in consultation with USAID*

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[1]   The procedures, published in final form in the fall of 1980, are codified in 22 CFR 216 (Title 22, Code of Fxederal Regulations, Part 216). Annex B reproduces the text of the regulation in full.

1.2. Use and contents

Regulation 216 is a particular implementation of the general environmental impact assessment (EIA) process, and conforms to norms of good EIA practice. After this introductory chapter, the structure of this manual mirrors this general process.

Specifically, EIA processes begin with an initial SCREENING on proposed activities or projects. The intent of screening is to identify activities which:

- by their nature pose inherently low risks of environmental harm

- by their nature pose moderate or high risks of environmental harm.

The screening result determines the nature of environmental analysis and documentation required. Low-risk activities require minimal documentation. Moderate and higher-risk activities are subject to more extensive environmental study and documentation requirements.

Chapter 2 is a step-by-step guide to screening under Regulation 216. Regulation 216 defines types of activities "normally having a significant [adverse] effect on the environment," as well as those for which environmental impacts are not expected to be significantly adverse. Regulation 216 establishes particular terminology for these screening outcomes and classes of activities. Chapter 2 introduces this terminology.

Chapter 2 also overviews the further analysis required by Regulation 216 for activities outside the low-impact group.

Once screening is completed, the reader turns to **Chapter 3**. Chapter 3 matches screening results to the type of environmental documentation required for the project. Each of the four types of basic documentation is described.

Chapter 4 is a detailed guide to writing the Initial Environmental Examination (IEE). The IEE is used to analyze all activities *except* those specifically enumerated in Regulation 216 as posing little risk of significant, adverse effects on the environment.[2]

Chapter 5 assembles frequently asked questions that have arisen about USAID and USAID partner environmental compliance, especially those posed originally by members of the Environmental Working Group of Food Aid Management (FAM).

Topics include: (a) the rationale for environmental compliance; (b) responsibilities and timelines; (c) Environmental compliance documentation; (d) environmental analysis; and (e) designing and managing more environmentally sound activities. Beyond the answers provided here, you should feel free to contact your USAID Mission or Bureau Environmental Officer (BEO).

The Annexes include a detailed discussion of activity classification under Reg. 216, forms and sample USAID compliance documents, official

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EPTM contents

Chapt. 1	Introduction and overview
Chapt. 2	Step-by-step guide to screening under Reg 216
Chapt. 3	Matching screening outcomes to environmental documentation requirements
Chapt. 4	A guide to writing the IEE
Chapt. 5	Frequently asked questions
Annexes	A: Reg. 216 definitions B: Official USAID Guidance C: Blank environmental documentation forms D: Sample environmental documentation E: Sample tables and matrices F: Programmatic Environmental Assessments (PEAs) G: Umbrella IEEs and subgrant environmental screening

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[2] As the name implies the IEE is an *initial* study. Regulation 216 mandates that a full Environmental Assessment study to be completed when the IEE indicates that a project may result in significant adverse effects on the environmental.

guidance (including the full text of Reg. 216), and other useful information on the compliance process.

NOTE: The manual is written as a reference document, and information is occasionally repeated so that descriptions of a particular topic are self-contained.

We hope that the step-by-step process outlined in this package will make adopting USAID environmental procedures easier. Experience has shown that complying with procedures strengthens development activities and makes them more sustainable. This manual may appear daunting, but it is intended to make environmental compliance less burdensome.

1.3. Rationale for the procedures and compliance

Almost all development activities affect the environment in some way (see Table 1.1.) The intent of USAID's environmental procedures is NOT to prevent all such impacts. This would be equivalent to prohibiting all development. And such a position ignores the reality that the environmental impacts of "business as usual" may be far worse than those which would occur under a well-planned activity, project or program.

Instead, the procedures are intended to assure that environmental issues receive adequate consideration in design and implementation. This is necessary so that (1) knowledgeable tradeoffs can be made between economic, social and environmental outcomes; and (2) project failure arising from environmental causes can be avoided.

Ultimately, the procedures are intended to prevent *development failures* rooted in environmental causes. Failure occurs in a number of ways. It may occur when improper disposal of waste from a new health post contaminates a community water supply, or when poorly designed or maintained drainage structures of a new rural access road destroy downslope cropland. Or it may occur in more subtle ways, when the effects of a program gradually degrade ecosystem resources and services essential to agricultural productivity and future development.

For this reason, compliance with Reg. 216 should be viewed as much more than a paper exercise. It should be viewed as a formal framework for engaging in *environmentally sound design* of development activities. This cannot happen when environmental documentation is completed after activity, project or program design is complete. Environmental analysis should be integrated into the lifecycle of each proposed intervention.

For details regarding environmentally sound design principles and their relation to Regulation 216 and the project lifecycle, see "An Introduction to Environmentally Sound Design" in *Environmental Guidelines for Small-Scale Activities in Africa. (*USAID, 2000; available for download at www.encapafrica.org.

The purpose of regulation 216. . .

➢ *is NOT to prevent all environmental impacts associated with development activities*

➢ *IS to assure that environmental issues receive adequate consideration in activity design and implementation.*

➢ *IS to avoid environmental project failure and improve sustainability of activities.*

Table 1.1: Typical USAID Supported Activities and Their Potential Adverse Environmental Implications

Type	Activity	Potential Adverse Environmental Impacts
Irrigation	rehabilitation of older schemes or new construction river diversions dam and pond construction land leveling digging/boring wells	transmission of waterborne diseases destruction and/or impairment of wetlands salinization of soils alteration in aquatic ecology, including fisheries surface and groundwater water pollution (non-point source farm runoff) effects on downstream water flow effects on groundwater quantity water use conflicts
Water Supply and Sanitation	potable water supply latrines & sewerage water catchments wells & ponds	groundwater aquifer drawdown or depletion waterborne disease transmission contamination of groundwater deforestation, overgrazing, trampling of vegetation around wells
Health Services Programs	immunizations AIDS/HIV treatment	medical and biohazardous wastes disposal of used/spent needles
Rural Infrastructure	construction and/or rehabilitation of secondary and tertiary (farm to market) roads construction of public buildings (health posts, schools)	opening of otherwise intact forest or protected areas to exploitation and/or destruction erosion and uncontrolled runoff from improper construction practices or lack of adequate drainage impacts on land use, e.g., wetlands or farmlands
Natural Resources Management	soil and water conservation, e.g., bunds, terracing, etc. reforestation land clearing exotic species introduction, e.g., non-indigenous seed	improper/incomplete structures add to erosion potential inadvertent shifts in land use patterns destruction of natural or secondary forest for reforestation with exotic species disruption of ecosystem balance through commercial production or harvesting of fauna or flora displacement by exotic species of endemic (local) species; weediness
Crop Protection, Livestock Disease Control	introduction and application of pesticides use of dip vats	water pollution (non-point source farm runoff) environmental contamination human contact with toxic substances (acute or chronic) residues in food commodities, milk and meat poisoning of livestock

1.4. Resources to support Reg. 216 compliance, environmental analysis, and associated capacity-building

USAID Resources. Partners and Mission staff will find that there are other sources of information within USAID Missions and Regional Bureaus regarding compliance with 22 CFR 216.

- To the extent that this *EPTM* or other similar unofficial Agency documents suggest processes or procedures for completing Initial Environmental Examinations (IEEs) and other environmental documentation, these are meant to be purely advisory and, it is hoped, helpful suggestions. For authoritative guidance, refer to 22 CFR 216 itself, and consult with USAID's Bureau Environmental Officers (BEOs) or other knowledgeable staff.

- USAID's environment home page is a useful portal to many of the agency's environmental resources and publications (http://www.usaid.gov/environment).

- Africa Bureau's Environmental Capacity-Building Program (ENCAP) website contains training and resource materials on Regulation 216 compliance, environmentally sound design, and environmental review and analysis (www.encapafrica.org).

- Other Bureaus also maintain environmental resource sections of their websites, including the Europe and Eurasia Bureau (http://www.usaid.gov/regions/europe_eurasia/), and the Asia and Near East Bureau (http://www.usaid.gov/regions/ane/).

- AFR's Africa Bureau maintains a number of pertinent resources and documents (www.afr-sd.org). These include a searchable database of the environmental documentation submitted for Africa-based projects and decisions rendered (http://www.afr-sd.org/IEE/).

Help with Small-Scale Projects. There are many handbooks on environmentally sound design and management of small-scale projects. A first point of departure should be USAID's *Environmental Guidelines for Small-Scale Activities in Africa* which provides summary guidance for a number of common sectors, and provides an annotated sector-by-sector bibliography (available for download at www.encapafrica.org).

Web portals. A number of organizations maintain websites which catalogue and provide access to a wide set of environmental assessment/ environmentally sound design resources:

- Food Aid Management (FAM) maintains an extensive library of environmental resources, including best practice resources and environmental documentation submitted to USAID by its partner organizations. (www.foodaid.org)

> **Disclaimer**
>
> This manual is advisory. It does not replace or supplant the text of Regulation 216.
>
> For authoritative guidance, consult the text of the regulation, or a USAID Bureau Environmental Officer (BEO) or Regional Environmental Officer (REO)

- The International Association for Impact Assessment (IAIA) website is a valuable starting point for exploring environmental assessment resources on the Internet (www.iaia.org)

Note also that general environmental impact assessment/environmentally sound design resources are available within host country universities, among host government environmental/natural resource planning and management units, and through in-country private consultants. It may also be possible to capitalize on available training courses in technically specific areas of value to USAID Partners and/or Mission staff.

USAID Missions, PVOs and other Partners have generated numerous ideas on how best to provide additional resources and capacity to support environmental analysis. Some of these ideas are discussed in Section 5. We welcome your additional suggestions and thoughts.