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FACTSHEET: Environmental Procedures Best Practices Review

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1. 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 effectiveness and efficiency of Mission compliance with USAID’s Environmental Procedures (see box), and to integrate this compliance into normal Mission operations.

The BPR identifies gaps in a Mission’s application of the Procedures, recommends measures to address them, and results in an Environmental Compliance Action Plan to implement these measures. The BPR exercise assesses the extent to which:

- Required environmental compliance documentation [Categorical Exclusions, Initial Environmental Examinations (IEEs), and Environmental Assessments (EAs)] is in place for existing activities and “in pipeline” for planned activities;

USAID 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:

- integrated into procurement instruments;
- translated into activity-specific environmental mitigation and monitoring plans; and
- implemented and monitored over the life of the activity.

For more information, visit the “IEE Assistant” at www.encapafrica.org/assistant.htm

- Mission and project staff understand their roles and responsibilities related to the Procedures;
- 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 fill them;
- Procurement instruments reflect IEE and EA conditions;
- Environmental mitigation and monitoring is implemented;
- Environmental compliance is integrated into project reporting.

2. 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:

- SO- and activity-level IEEs that inadequately cover specific activities being implemented;
- IEEs or EAs with conditions (mitigation measures) that are not being implemented, monitored, or reported on at the project level;
- Procurement mechanisms that fail to incorporate environmental compliance requirements and a budget for implementation of IEE or EA conditions; and
- Mission and project staff unaware of their roles and responsibilities under USAID's Environmental Procedures.

The implementation of BPRs was 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 programs, particularly those using DDT.

3. How is a BPR conducted?

The BPR analyst (either external or from within the mission) will conduct a desk review of key documentation, use a tested questionnaire in interviews with mission staff and partners, and possibly conduct limited field visits. The BPR is expected to be done in coordination with the Mission Environmental Officer or designee, and with support from the Regional Environmental Advisor.

Type of documentation analyst will review during the BPR exercise:

- MEO appointment memo
- Mission Order on environmental compliance
- Reg. 216 Environmental Documentation (IEEs, Categorical Exclusions, EAs)
- Project Quarterly/Semi-Annual Reports
- SO Team Semi-Annual

- Portfolio Review documents
- Annual Reports
 - Mission Training Plan
 - Procurement Plan
 - Activity Approval Documents
 - Current 118/9 Assessment

The analyst uses a field-tested BPR questionnaire to help characterize how well the Mission is implementing the Environmental Procedures at the Mission, SO, and project levels.

At the Mission, the analyst will interview SO Team Leaders, Cognizant Technical Officers (CTOs), the Program Officer, Contracting Officer, Legal Advisors, and other key Mission staff. In addition, the analyst may choose to interview project staff especially those working on projects with EAs or complex IEEs and IEE conditions. The analyst may

also wish to conduct site visits to assess EA/IEE implementation in the field.

The BPR takes about **10 to 15 days total of analyst LOE**: two to three days for reviewing Mission documents; four to six days conducting interviews at the Mission and with target project staff; and two to three days after interviews are completed to produce the Environmental Compliance Action Plan.

4. What is the Mission’s role in the BPR?

Prior to interviews, appropriate staff will be contacted to provide the analyst with copies of all Reg. 216 documentation and guidance; these can be in electronic or hardcopy format.

Mission staff interviews will normally take 20-45 minutes, depending on the staff person’s involvement with Reg. 216. The MEO (or designee) may participate in any or all interviews.

The analyst may need assistance in setting up meetings with partners and in arranging site visits.

At the end of the BPR exercise, the Mission may ask the analyst and the MEO to provide a short briefing on the BPR findings and recommendations and/or training on Reg. 216 implementation. Partners may also be involved in the briefing or training.

5. What are the outputs of the BPR?

At the end of the BPR, the analyst will draft an Environmental Compliance Action Plan that details areas that need strengthening and actions necessary to bring the Mission into full compliance. The Action Plan will:

- (1) identify all Categorical Exclusions, IEEs, and EAs currently in force, and determine gaps in coverage;
- (2) determine the extent to which IEE and EA conditions are being implemented and monitored;
- (3) evaluate capacity of Mission and project staff to apply USAID’s Environmental Procedures, and recommend training as necessary;

- (4) evaluate environmental compliance-related Mission guidance (Mission Order on Environmental Compliance, MEO Appointment Memo, etc.), and recommend areas that can be strengthened as necessary;
- (5) evaluate procedures at the Mission, SO, and activity levels where environmental compliance should be incorporated, systematized, or strengthened, and recommend improvements;
- (6) strengthen field-based tracking and monitoring of IEE/EA application (implementation of mitigation measures) by Mission and Project staff; and
- (7) help the Mission to identify locally-based technical support in environmental compliance and environmentally sound design and management, if necessary.

6. What is expected of the Mission once the BPR is completed?

Any gaps in IEE and EA coverage identified by the Action Plan must be corrected by the Mission, as all USAID activities must have an approved IEE (or a Categorical Exclusion) prior to disbursement of funds. Beyond this, the Action Plan provides recommendations only. The recommendations are intended to be practical and are meant to strengthen project outcomes. However, the Mission is not obligated to implement them.

7. Are resources available to help Missions conduct a BPR?

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

- (1) **REA/regional support:** Regional Environmental Advisors in the regional platforms are available to provide technical assistance and coordination of BPR implementation, and should be engaged to some extent for each of the BPRs;
- (2) **AFR/SD resources:** Africa/Bureau's ENCAP program is available to provide technical assistance to the BPR process and to support Action Plan implementation;
- (3) **External resources:** The Mission may want to contract, with its own resources, with a consultant to help conduct the BPR and implement the Action Plan. Ideally, such support would be local and therefore more available for follow-up support. AFR/SD can help identify international consultants, as needed, and can provide assistance with Scopes of Work.