Session 10.
Environmental Compliance Reporting

Technical presentation and dialogue

Summary

USAID CORs and AORs are required by ADS 204 to monitor and evaluate on an ongoing basis whether the environmental mitigation required by the governing IEE(s)/EA is being implemented and is effective.

In other words, COR and AOR oversight responsibilities extend to environmental compliance, just as they do to other elements of project implementation. Practically, this requires that IPs not only systematically comply with IEE/EA conditions by developing and implementing EMMPs, but that they *report* to USAID on this implementation.

Regional best practice for IP environmental compliance reporting consists of two elements:

1. **Project reporting should provide an auditable record of environmental compliance.**

   Generally, IPs' quarterly or semi-annual reports should contain a separate environmental compliance section. The section must provide sufficient information on the status of EMMP implementation for USAID to effectively fulfill its oversight and performance monitoring role.

   If the EMMP contains a "monitoring log" section, then the EMMP itself—updated with current monitoring results—can simply be appended to the report.

   For larger projects, or those with complicated EMMPs, a text summary/short analysis of EMMP implementation is needed. This should highlight key mitigation activities underway in the reporting period, any significant issues encountered, and corrective actions/adjustments made.

   Any specific reporting requirements imposed by the IEE or EA must also be satisfied.

2. **One or more key project performance indicator(s)—"project results framework"—should reflect overall environmental soundness/environmental compliance.**

   In other words, the most critical elements of environmental soundness/compliance should be integrated, or "mainstreamed" into the project results framework. For example:

   - *In a water point provision project*, the IP might use the indicator "number of protected water points established with zero fecal coliform after six (6) months" rather than simply "number of water points established."
   - *In a road rehabilitation project*, the IP might use the indicator "km of road rehabilitated under environmentally sound practices" rather than simply "km of road rehabilitated."

   In both cases, the "environmentalized indicator" demonstrates that core project activities are being executed with attention to environmental soundness/compliance. However, it is NOT expected or appropriate to "environmentalize" every key indicator, or to capture every mitigation measure.

   (This best practice applies to new awards; where EMMPs are developed *after* the PMP is established, it may not be possible to change key performance indicators.)

Missions should not rely on IP progress reports alone to track environmental compliance. Field visits at minimum should include a quick check for significant environmental design/management problems (for certain activities, the Visual Field Guides [VFGs] may be used).

For environmentally complex activities, specific field visits should be made to verify EMMP implementation.

In summary, IP and USAID environmental compliance roles and responsibilities are as follows:

Project stage	Implementing Partner	USAID
Workplan & PMP Development	Develops EMMP Integrates EMMP into budget and workplan Determines environmental compliance reporting	Review and approval of: 1. the EMMP (for responsiveness to IEE/EA conditions and sufficiency of monitoring); 2. The budget/workplan (to verify that EMMP implementation is planned and funded); and 3. The reporting framework to assure that environmental reporting requirements are met.
Implementation	Implementation of EMMP Reporting on EMMP implementation	Ongoing review of partner progress reports to monitor EMMP implementation Field visits—at a minimum, all visits should integrate a quick check for significant environmental design/management problems. For environmentally sensitive activities, specific visits should be made to verify EMMP implementation.

Objectives

Achieve a common understanding of the two basic elements of IP environmental compliance reporting:

(1) providing USAID with an auditable record of IP environmental compliance; and

(2) "mainstreaming" critical elements of environmental soundness/compliance into one or more core program performance indicators.