



# FACTSHEET

## ENVIRONMENTAL MITIGATION & MONITORING PLANS (EMMPS)

### I. INTRODUCTION

**EMMPs** are required for almost all USAID-funded activities with a governing Initial Environmental Examination (IEE) or Environmental Assessment (EA) requiring mitigation of environmental or social risks. The EMMP is the basis for systematic implementation and monitoring of these requirements.

This factsheet describes the EMMP and its role in life-of-activity environmental compliance for USAID. It also provides guidance and resources to inform EMMP development. It is intended for Implementing Partners (IPs), Agreement/Contracting Officer's Representative (AOR/CORs), Mission Environmental Officers (MEO), Monitoring and Evaluation (M&E) Specialists, and consultants who may be engaged to develop EMMPs for USAID activities worldwide.

### 2. WHAT IS AN EMMP?

An EMMP sets out:

1. **Actions and Impacts.** Actions from the IEE or EA are linked to their associated adverse environmental and social impacts.
2. **Mitigation measures.** Specifies the measures that will be taken to satisfy the IEE or EA social and environmental conditions and mitigation requirements. Provides specificity to the conditions and mitigation requirements presented in the IEE, so they can be implemented and monitored.
3. **Monitoring.** Sets out the indicators or criteria that will be used to monitor (1) whether the mitigation measures have been implemented, and (2) whether they are effective and sufficient.
4. **Responsible parties and schedule for mitigating, monitoring, and reporting.**

EMMPs may also include a log of monitoring results and budget estimates for mitigation and monitoring activities.

### 3. WHY EMMPs?

EMMPs are essential for implementation of IEE and EA conditions and mitigation requirements. The purpose is not only to anticipate, but to prevent or reduce adverse impacts on beneficiaries, communities, environmental resources, and ecosystems.

In addition to establishing responsibilities and schedules, EMMPs are a vehicle for translating IEE or EA conditions and mitigation requirements (which are often very general) into implementable and verifiable measures that are specific to an activity. EMMPs provide a framework for environmental compliance reporting (See Section 9).

For USAID activities, failure to implement IEE or EA mitigation requirements puts the activity in non-compliance and increases the risk of adverse impacts caused by the activity and its associated beneficiaries, communities, environmental resources, and ecosystems. The AOR/COR is REQUIRED to assure that appropriate corrective actions are taken or modified.

### 4. WHEN AND HOW ARE EMMPs REQUIRED?

EMMPs are required when the Reg. 216 documentation governing the activity is either an IEE or an EA that requires mitigation for at least one entailed action to reduce environmental, social, or—for some EMMPs—climate risks to the project.

This requirement is established by the conditions set out in the IEE or EA. Awards require IP compliance with these conditions.<sup>1</sup> EMMPs may be stand-alone or they may be a part of subsidiary review documents and processes required by IEEs and EAs.

### 5. WHO DEVELOPS AND IMPLEMENTS EMMPs?

The AOR/COR is responsible for assuring that the EMMP is developed and implemented. The USAID Activity Managers also may assist with monitoring of the EMMP. Often, the award requires that the IP develop the EMMP for submission to the AOR/COR (see Section 8: EMMP Submission, Review and Approval). Generally, the IP develops the EMMP, but the IP always implements the EMMP.

### 6. STEPS IN EMMP DEVELOPMENT

The Agency's standard EMMP template is available here:

<https://www.usaid.gov/documents/1865/environmental-mitigation-and-monitoring-plan-emmp>.

EMMP development consists of six basic steps.

1. Review the governing IEE or EA to understand the action, impacts, and mitigation or conditions requirements (reference the BEO specific conditions and Section 5 of the IEE) that apply to your activity.
2. Translate IEE or EA mitigation requirements or conditions into site-specific, implementable mitigation measures and identify the extent of activity control. For example, good EMMPs do

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<sup>1</sup> The ADS 204sac Help Document "Environmental Compliance: Language for Use in Solicitations and Awards" provides best-practice awards language that makes the requirement for EMMPs explicit.

NOT include mitigation measures that simply state, “best practices will be implemented per the Sector Environmental Guidelines (SEGs).” They DO specify which practices and which guidance from the SEGs will be implemented.

3. Specify monitoring indicators that ascertain whether mitigation was implemented, sufficient, and effective.<sup>2</sup>
4. Specify timelines and responsible parties.
5. Determine who will have overall responsibility for EMMP implementation. Ideally, the key individual responsible for oversight of EMMP implementation is a developer of the EMMP who has insight and access to reporting from the entire implementing organization.
6. Share the approved EMMP with all relevant stakeholders within USAID and impacted partner organizations. Ideally, EMMPs should be easily accessible to these stakeholders over the life of the activity or program.

## 7. EMMP SUBMISSION, REVIEW AND APPROVAL

EMMPs must be approved before beginning the implementation of actions covered by the EMMP.

**Timing of development and submission.** Except if otherwise specified by the IEE, the EMMP is submitted together with the workplan to the AOR/COR. The EMMP should be *finalized* concurrent with development of the workplan and detailed budget for the activity.

**Review and approval.** At a minimum, the AOR/COR (or USAID Activity Manager, as delegated by the AOR/COR), in consultation with the MEO (for Mission activities), must review and approve the EMMP. EMMPs should be revised and revisited at least annually as the scope of an activity changes and reporting on them must be readily available for review by the AOR/COR, Regional Environmental Advisor (REA), MEO and Bureau Environmental Officer (BEO).<sup>3</sup>

## 8. IMPLEMENTING EMMPs

Experience shows that systematic EMMP implementation requires:

- **Establishing accountability.** Oversight responsibility for EMMP implementation must be assigned to an appropriate, qualified IP staff member, and this responsibility must be part of their position description.
- **Workplan integration.** Where the EMMP requires discrete work elements, these must be entered into the activity workplan. Examples of such discrete elements include, e.g. “train staff and partners in environmental compliance,” “develop a waste management plan,” etc. By contrast, some mitigations do not result in separate work elements *per se*. For example, an EMMP could require that “all plans, strategies, and other relevant documents address environmentally sound collection, management, and disposal of healthcare waste”. Environmental compliance monitoring should be a workplan item.

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<sup>2</sup> Consult USAID’s sector-specific environmental and social guidance to support development of mitigation:

<https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices>

<sup>3</sup> IEE special conditions or a mission and/or bureau processes may require additional reviews and approvals of EMMPs, including by the MEO, REA, and/or BEO, particularly for environmentally sensitive activities.

- **Budget integration.** Discrete workplan elements called for by the EMMP must be reflected in the activity budget. However, even EMMP requirements that do *not* result in discrete workplan elements may increase costs. The best way to make sure that cost implications of the EMMP are captured is to develop mitigation and monitoring cost estimates as part of EMMP development. If this is not possible, budget notes should be developed for mitigations that have cost implications, and these notes passed on to the budgeting team.
- **Management commitment & staff awareness.** The Chief of Party (COP) and senior managers of an activity must communicate to all staff and partners a commitment to environmental compliance to strengthen development outcomes.

All staff should be aware in general terms of the core environmental requirements that apply to the activity, and of the existence of the activity’s EMMP.

## 9. EMMPS & ENVIRONMENTAL COMPLIANCE REPORTING

Overseeing EMMP implementation means verifying that mitigation measures are being implemented, are effective, and are routinely reported on. It is recommended practice that the AOR/COR, Activity Manager, or M&E Specialist examine EMMP implementation during field visits. The MEO, REA, and BEO may assist when possible.

The IP must provide progress reports on a schedule consistent with award reporting requirements. The report should include an auditable record of environmental compliance and implementation of IEE/EA mitigation requirements. This will enable AOR/COR to fulfill their responsibility under ADS 204 to “actively manage and monitor” IEE/EA compliance with mitigation requirements and conditions. EMMPs provide the framework for this environmental compliance reporting.

In many cases the governing IEE or the AOR/COR specifies mandatory compliance reporting requirements and formats — usually in the form of the standard Environmental Mitigation and Monitoring Report.<sup>4</sup>

## 10. USAID RESOURCES FOR MITIGATION AND MONITORING

Topic	Recommended Resource
Mitigation and Monitoring Principles	Remote learning modules, topic briefings and other resources available via the Mitigation, Monitoring and Reporting Section of USAID’s environmental procedures website <a href="https://www.usaid.gov/environmental-procedures/environmental-compliance-esdm-program-cycle/mitigation-monitoring-reporting">https://www.usaid.gov/environmental-procedures/environmental-compliance-esdm-program-cycle/mitigation-monitoring-reporting</a>
Sectoral Mitigation Guidance	USAID Sector Environmental Guidelines Covers more than 20 common development sectors and provides overviews of environmental and social impacts and mitigation guidance in table format. <a href="https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices">https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices</a>

<sup>4</sup> EMMR template available at: <https://www.usaid.gov/documents/1865/environmental-mitigation-and-monitoring-report-emmr>

Topic	Recommended Resource
Field Monitoring for Non-specialists	<p data-bbox="386 245 646 275"><i>USAID Visual Field Guides</i></p> <p data-bbox="386 296 1349 401">Complements to the SEGs, these photo-based field guides allow non-specialists to quickly identify key, common environmental management deficits in smaller-scale activities in the following sectors:</p> <ul data-bbox="435 415 695 611" style="list-style-type: none"> <li data-bbox="435 415 630 445">● Construction</li> <li data-bbox="435 457 630 487">● Water supply</li> <li data-bbox="435 499 586 529">● Sanitation</li> <li data-bbox="435 541 695 571">● Health care (waste)</li> <li data-bbox="435 583 548 613">● Roads</li> </ul> <p data-bbox="386 632 1300 693"><a href="https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/visual-field-guides">https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/visual-field-guides</a></p>