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FFP FY10 MYAP Environmental Budgeting: Presentation to MYAP Chairs

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Environmental Officer (BEO)**

Jan 11, 2010



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Three Issues for FY10 MYAP Review

1. IEE Requirements & Clearances
2. Environmental Budgeting
3. Other: Environmental M&E



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Requirements & Clearances

- **All MYAPs must submit an IEE with proposal which must include:**
 1. Annex C: IEE
 2. Annex Ci & Cii: Environmental Management Forms
- **IEE must be cleared by:**
 1. Mission (MEO, FFP and MD)
 2. FFP/D, FFP CBO
 3. BEO/DCHA

FFP coordinates all clearances & BEO cc'd on emails



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Environmental Budgeting

FY10 Guidelines: Annex C

Annex C II. 1. D. Budgeting for Environmental Compliance:
Applicants should ensure that all necessary **funding for environmental mitigation measures** specified in the IEE and in *Tab 1: Identification of Mitigation Plan* **is requested in** the proposed **food aid program budget**. Proposed funds for environmental mitigation should be included in the **comprehensive and detailed budgets**. These costs should be explained and justified in the **budget narrative**.

http://www.usaid.gov/our_work/humanitarian_assistance/ffp/fy10_iee.pdf



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Environmental Budgeting

Necessary Budgetary Documentation:

- Budget Narrative
- Detailed and Comprehensive Budgets
- Detailed Implementation Plan (DIP)
- Technical Review Memo (as needed)
- Negotiations Memo (as needed)
- Language in CA



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What type of Activities??

Illustrative Activities:

1. Capacity Building;
 - Staff training, including both internal trainings and external and/or international workshops, conferences, seminars
 - Community Member Training
2. PVO Staffing (e.g., Environmental Coordinator)
3. Biophysical infrastructure or construction materials for mitigation measures
4. Monitoring and Evaluation
5. Periodic Environmental Consulting for technical (PERSUAPs, Climate Change Adaptation)



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Environmental Budgeting

Pitfalls to Avoid:

- Environmental budget in the narrative, but not in the detailed/comprehensive.
- No information in the DIP.
- Give CBOs an idea of what to look for, see example Issues Letter and Email to Awardee



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Environmental Budgeting

Example Communications: Madagascar FY09 MYAP (Handout)

1. Example Issues Letter concerning Environmental Budgeting (BEO to CBO)
2. Email from CBO to MYAP awardee detailing requirements for environmental budgeting



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Roles and Responsibilities

1. MYAP Review Chair ensures that:
 1. IEEs and EMFs are included in MYAP submission
 2. All Mission and FFP/D clearances are completed
 3. BEO/DCHA kept abreast of MYAP competitive process
 4. Budgets contain environmental mitigation funding
 5. Negotiation Memo includes any necessary environmental budget info (clear with the BEO)
2. POD concurs on any final environmental budget issues
3. BEO Review and Final Clearance of IEE



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Environmental M&E

FY10 Guidelines: Annex C

Annex C II. 1. : Monitoring and Evaluation: All activities in the technical sectors of ... [LIST.] ... **should describe how the environmental impact will be monitored and viable indicators should be suggested.** Also, applicants should discuss whether the environmental effects will be part of the proposed food aid program's overall M&E system (i.e., **in the proposed indicator performance tracking table submitted** with the food aid program proposal) and, if so, whether annual and impact indicators have been developed. **Funding should be specified for M&E** for any environmental impacts of activities anticipated to be classified as “negative determination with conditions”.



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Environmental M&E

How to ensure FFP Environmental M&E policy?

1. Work with the BEO to review the MYAP IPTT
2. Ensure that FANTA-2 includes an Environmental module in the M&E workshops (Dale or Juli)
3. BEO will help coordinate with Mission or attend M&E workshop and deliver module directly



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Overall Environmental Sustainability

“The IEE is only the beginning, that is, it is the plan for action for environmental protection. Without actual implementation, then the IEE is not worth the paper it is too often printed on.”



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Ancillary



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Attachment1: Example Issues Letter concerning Environmental Budgeting (BEO to CBO)

- **Review of Environmental Capability Statement for CRS Madagascar MYAP**
- **March 3, 2009**
- **Issues for Resolution:**
- **No funding for Environmental Monitoring stated in Budget.** While the CRS Consortium ECS (attachment 1) states that “SALOHI program’s environmental monitoring activities are budgeted within natural resource management activities (including consultancies) as described in the budget and budget narrative contained in Appendix 5”, there is no evidence of such in either the “Budget Narrative” or “Comprehensive Budget”. All budget related documents needs to incorporate funding for environmental monitoring activities, in either an integrated or stand-alone manner. Either approach is appropriate, it must simply be ensured that each member of the consortium have access to funding for environmental mitigation and monitoring^[1].
 - Integrated budgeting would entail mainstreaming environmental mitigation measures in to the baseline survey, M&E manual to be developed, the FFS training, IEC printed materials, training materials for community vegetable gardening, etc.
 - Stand-alone budgeting would entail a line item in the “Comprehensive Budget” and “Budget Narrative” for Environmental Mitigation and Monitoring across all sectors.
- **No funding for Environmental Technical Consultancies stated in Budget.** While the ECS states that “As needed, the SALOHI program will contract environmental technical specialists to undertake specialized investigations when the environmental monitoring system indicates that an unexpected impact may or has arisen.”, there is no evidence of such in either the “Budget Narrative” or “Comprehensive Budget. There are two issues.
 - First, CRS and the Consortium measures are well-equipped to plan ahead for the need for such environmental mitigation measures. The Consortium has abundant experience implementing these types of interventions in Madagascar or similar settings. Thus, it will be clear to the Consortium where the need for environmental mitigation measures will be required. For example, e.g., erosion control for road rehabilitation (check dams in gullies, tree planting in upper watershed) is a mitigation measure that will be required as part and parcel of an effective road rehabilitation intervention. The Consortia should not “wait and see” but “plan for the likely in advance”. While this level of detail is not required at this point, an item in the Budget must speak to this need.
 - Two, should a need for such an environmental technical consultancy arise, then the “Budget Narrative” needs to plan for this possibility in the Consultancy section.
- **Budget includes procurement of “sprayer”, presumably for pesticide application.** In the Materials under \$5000, point # 6 includes provisions for the purchase of “sprayers”. Sprayers are typically used for pesticide application at the field level. No pesticides are to be used or procured- including purchasing of sprayers to support use of pesticides- can proceed without addressing the risks and mitigation measures for pesticides use and viable alternative, pursuant to 22 CFR 216.3(b). Please clarify.
- ^[1] To state the obvious: environmental measures would only be in place for those activities that would have a potential for environmental impact, i.e., Negative Determination with Conditions 22 CFR 216 classification such as soil and water conservation, irrigation, road rehabilitation and water/sanitation.



Attachment 2: Email from CBO to MYAP awardee detailing requirements for environmental budgeting

From: Taylor, Jason (DCHA/FFP)

Sent: Monday, April 06, 2009 9:32 AM

To: rcaldero@crs.org

Cc: Christopher Bessey; ABechtel@amexdc.com; 'Kevin Doyle'; Clescerci, Erika (DCHA/PPM)

Subject: SALOHI Environmental Component

Importance: High

Rosie,

The Bureau Environmental Officer and I have reviewed the environmental compliance and mitigation components, as outlined by the narrative and IEE of the CRS/SALOHI proposal. The shared goal we have is for the program documents (budget, budget narrative, DIP) to clearly map the budget expenditure, consultancy and staff activities, and environmental mitigation standards required for CRS/SALOHI to implement the conditions as presented in the SALOHI Initial Environmental Examination (IEE). We noted the following items:

- In the comprehensive budget of the **Revised Proposal -- 20 March 2009** CRS budgets approximately \$20,000 (or \$5,000/year) for an Environmental Technical Specialist to oversee environmental compliance. FFP feels that size of the budget expenditure suggests that the scope of the consultancy may be too modest. Please provide more information on the nature of the consultancy. Where will the consultant be coming from? What will be the likely scope of work? Will there be any staff training responsibilities to improve environmental compliance? How long will the consultant be in Madagascar each year (one week? six weeks?)? Also, this consultancy is not reflected in the DIP activities but it should be.
- In the budget narrative, "5. Training" a budget of \$1575 for USAID environmental compliance for 20 participants, please provide more information on the nature of the training encompassed by this modest budget.

FFP requests that CRS revise the environmental compliance components of the MYAP proposal by taking the following steps. I've added the proposal document(s) that should reflect each revision in parentheses:

Environmental Technical Specialist Consultancy:

- Clearly explain the specific tasks and deliverables expected from the Environmental Technical Specialist (*Proposal Narrative -- Environmental Capability Statement*)
- Strongly consider augmenting the scale and scope for the Environmental Technical Specialist, which may require annual budget expenditure up to \$10,000/year (*CRS/SALOHI Comprehensive, Detail Budget, Budget Narrative*)
- Consider hiring the same consultant to serve as the Environmental Technical Specialist for the duration of the MYAP. This will help build and maintain a relationship between the specialist and the CRS/Madagascar staff, as well as a working knowledge of present, past, and anticipated environmental issues (*Proposal Narrative -- Environmental Capability Statement*)
- Add the consultancy into the DIP. (*DIP*)

Monitoring & Evaluation:

- Build environmental compliance monitoring into the scope of work for the M&E officer. Add additional environmental compliance indicators or "environmentalize" existing indicators to standard program-wide M&E activities*. This approach will ensure that consistent attention is being paid to environmental issues and that an ongoing gap analysis will unfold. This M&E will additionally help guide and better target the annual work of the Environmental Technical Specialist. The Environmental Technical Specialist could work with the M&E officer to analyze these data and address any problems identified. These measures would then be reported out in the annual Environmental Status Report. The Specialist may also see fit to conduct environmental trainings for staff, if gaps persist. (*IEE, Proposal Narrative -- Environmental Capability Statement, M&E plan**)
- Strongly consider requiring environmental compliance competency to be part of the skill set of the M&E officer. (Strong recommendation; No action necessary)

Clearly indicate in the IEE what construction standards CRS will adhere to for each activity (i.e. FFW roads, WATSAN activities). These standards should be clear and internationally recognized or practiced locally. This set of standards will help by encouraging better activity design, more accurate budgeting, and better targeted monitoring. For example, Chapter 14 on Rural Roads in USAID/AFR *Environmental Guidelines for Small Scale Activities in Africa* (EGSSAA) located at: (<http://www.encapafrika.org/SmallScaleGuidelines.htm>). Also useful guidance for road construction, maintenance and rehabilitation are guidelines given in *Low-Volume Roads Engineering: Best Management Practices Field Guide*, by Gordon Keller and James Sherar, by the US Forest Service for USAID and in collaboration with USDA. (July 2003) (see same ENCAP website, or <http://www.fs.fed.us/global>, or <http://www.zietlow.com/>). (*IEE, Proposal Narrative -- Environmental Capability Statement*)

* Environmental aspects of the M&E plan can be revised at the time of the August 2009 FANTA workshop with participation of the USAID Mission Environmental Officer and/or Regional Environmental Advisor.

Please feel free to contact me or Erika Clescerci, DCHA Bureau Environmental Officer, with any questions. I realize that making these changes will take time and that you are currently working on the most recent round of changes. **Do you think you could incorporate these adjustments and turn around the entire revision by or before the end of the week?**



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EMP Framework

Environmental Management Plan (EMP)

Annex Ci: Environmental Mitigation Plan

**Annex Cii: Environmental Monitoring and
Evaluation Tracking Table**



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FY Guidelines- Annex Cii: Tab 2:

Initial Environmental Examination

Tab 2: Environmental Monitoring and Evaluation Tracking Table

Applicant Organization:	
Proposed Project Name:	
Proposed Host Country:	
Submission Status:	
Submission Type:	
Fiscal Year:	

Type of Project:	
Location Name:	
Proposed Project Size:	
Nearby Communities:	
Senior Project Manager:	
Monitoring Period:	

Description of Mitigation Measure	Responsible Party	Monitoring Methods			Estimated Cost	Results				Recommended Adjustments
		Indicators	Methods	Frequency			Dates Monitored	Problems Encountered	Mitigation Effectiveness	
1						1				
						2				
						3				
						4				



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Notes from MYAP Chair Briefing (1/11/10):

- Pertinent MYAP Docs: Tech Memo (scores and review of MYAPs), Issues Letter to PVOs, Revise MYAP, Negotiation Memo (budget mostly coordinated comments from Mission, etc.),
- S Sudan and Liberia will be first MYAP priorities
- M&E workshops will begin in August for Bangladesh, Plan for TDY
- [Kristin/Amex PTD re: website, Lupe/Amex PTD website liaison]
- **Task 1:** Give heads up to MEOs and REA (Cisco, and Andrei, and Chris/David) for FFP MYAP IEEs
- **Task 2:** IEEs range in quality, please do quick review for IL (Paul N request), work with Steve G