



SUBAWARD RESOURCES & GUIDANCE

ADVANCING PARTNERS & COMMUNITIES

USAID ENVIRONMENTAL COMPLIANCE GUIDANCE
FOR SUBAWARD RECIPIENTS



Advancing Partners & Communities

Advancing Partners & Communities (APC) is a five-year cooperative agreement funded by the U.S. Agency for International Development under Agreement No. AID-OAA-A-12-00047, beginning October 1, 2012. APC is implemented by JSI Research & Training Institute, Inc., in collaboration with FHI 360. The project focuses on advancing and supporting community programs that seek to improve the overall health of communities and achieve other health-related impacts, especially in relationship to family planning. APC provides global leadership for community-based programming, executes and manages small- and medium-sized sub-awards, supports procurement reform by preparing awards for execution by USAID, and builds technical capacity of organizations to implement effective programs.

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This publication was produced by Advancing Partners & Communities (APC), a five-year cooperative agreement funded by the U.S. Agency for International Development under Agreement No. AID-OAA-A-12-00047, beginning October 1, 2012. The authors' views expressed in this publication do not necessarily reflect the views of the U.S. Agency for International Development or the United States Government.

TABLE OF CONTENTS

TABLE OF CONTENTS	V
ACRONYMS	VI
OVERVIEW	I
i. Introduction.....	I
ii. Environmental Verification Form.....	I
iii. Environmental Mitigation and Monitoring Plan.....	I
iv. Environmental Mitigation and Monitoring Reporting Form.....	2
v. Environmental Compliance in Trainings.....	3
ANNEX A: ENVIRONMENTAL VERIFICATION FORM	4
ANNEX B: EXAMPLE OF PROJECT EMMP	6
ANNEX C: TEMPLATE EMMP	9
ANNEX D: ENVIRONMENTAL MONITORING AND MITIGATION REPORT TEMPLATE	11
ANNEX E: WORLD HEALTH ORGANIZATION HEALTHCARE WASTE MANAGEMENT MINIMAL PROGRAM CHECKLIST AND ACTION PLAN – TO BE INCLUDED IN TRAINING MATERIALS/PROGRAMS	13
ANNEX F: DISPOSAL AND TREATMENT METHODS SUITABLE FOR DIFFERENT CATEGORIES OF HEALTHCARE WASTE TO BE INCLUDED IN TRAINING	16

ACRONYMS

APC	Advancing Partners & Communities
EMMP	Environmental Mitigation and Monitoring Plans
EVF	Environmental Verification Form
IEE	Initial Environmental Examination
NGO	Non-Governmental Organization
PIEE	Programmatic Initial Environmental Examination
PVO	Private Volunteer Organization
USAID	U.S. Agency for International Development

OVERVIEW

I. INTRODUCTION

This document provides guidance for private volunteer organizations (PVOs) and non-governmental organizations (NGOs) that are recipients of U.S. Agency for International Development (USAID) funds. The following pages provide guidance on how to meet the USAID Environmental Compliance requirements.

All USAID funded projects are required to meet certain environmental regulations to monitor and mitigate any potential negative effects on the environment. As an initial step of the environmental compliance process, USAID issues a pre-award analysis of potential activities that will be supported by the project to determine what environmental impacts a project's activities may have in the course of implementation. This pre-award analysis is called an Initial Environmental Examination (IEE) and should be used to develop a streamlined Environmental Mitigation and Monitoring Plan (EMMP) for subaward recipients.

An EMMP should be a three phase plan in which potential environmental threats are identified, a mitigation plan is developed, and mitigation efforts are reported on a regular basis. Based on the careful review of the umbrella IEE, the project should determine general categories of activities requiring mitigation measures.

II. ENVIRONMENTAL VERIFICATION FORM

Each subaward recipient is required to review its proposed activities against a pre-defined list of program activities which may pose an environmental risk. The subawardee will submit a completed Environmental Verification Form (EVF). To prepare the EVF, each organization will:

- Complete the top section of the EVF.
- Review the EVF checklist activities and compare to the recipient's proposed activities. Indicate if any of the identified activities will be included in project implementation by checking "Yes" on the EVF.
- An authorized individual from the recipient organization must certify the form is complete and accurate by signing the bottom of the form.
- Submit the completed EVF for review.

The EVF and any required resulting Environmental Mitigation and Monitoring Plans (EMMP) must be completed by each organization prior to the implementation of activities.

III. ENVIRONMENTAL MITIGATION AND MONITORING PLAN

The answers to the questions on the EVF will determine if an EMMP is required. The EMMP identifies the activities requiring mitigation, describes the environmental threats posed by the program activities as well as the mitigation measures planned to combat the identified threats, and indicates the plan for monitoring the implementation of these mitigation measures. A sample EMMP is provided in Annex B for reference.

USAID funding recipients can use the template provided in Annex C to tailor to the specific activities proposed under the project’s workplan. Only those activities to which the organization responded “Yes” on the EVF need to be included in the project’s EMMP. Activities for which the organization responded “No” on the EVF should not be included in the EMMP.

Below are the headings of the EMMP template with instructions on how to complete them:

Category of Activity	Describe specific environmental threats of your organization’s activities	Description of Mitigation Measures for these activities	Who is responsible for monitoring	Monitoring Indicator	Monitoring Method	Frequency of Monitoring
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- The **Category of Activity** is provided, based on the IEE. This column should remain unchanged from the template.
- The **Description of Environmental Threats** is provided, based on the IEE. This column should remain unchanged.
- The **Description of Mitigation Measures** should be adjusted as necessary to meet the specific project activities.
- The **Responsibility for Monitoring** requires each organization to identify a project staff position responsible for ensuring the mitigation measures are implemented.
- The **Monitoring Indicators** link with the mitigation measures provided in the example in Annex B. If the organization adjusts the proposed mitigation measures, then the monitoring indicators should be adjusted to be consistent with the mitigation measures.
- The **Monitoring Method** and **Frequency of Monitoring** should be adjusted accordingly to remain consistent with the mitigation measures and monitoring indicators.
- An authorized individual from the recipient organization must certify the form is complete and accurate by signing the bottom of the form.
- Submit the completed EMMP for review.

IV. ENVIRONMENTAL MITIGATION AND MONITORING REPORTING FORM

The Environmental Mitigation and Monitoring Reporting (EMMR) Form provides a clear format for reporting on the status of Mitigation Measures implemented under the subaward. The EMMR must be submitted each year and/or prior to the end of the project.

An EMMR template is included in Annex D. Below are instructions on completing this report:

- Lists the mitigation measures identified in the EMMP.
- For each mitigation measure, describe the status of the mitigation measure.
- Describe any issues which have arisen which may affect the effective implementation of any mitigation measures.
- An authorized individual from the recipient organization must certify the form is complete and accurate by signing the bottom of the form.
- Submit the completed EMMP for review.

V. ENVIRONMENTAL COMPLIANCE IN TRAININGS

Training of health care workers in techniques resulting in the generation and disposal of medical waste is a common activity. The improper disposal of sharps or other highly infectious health care waste may have a negative impact on the environment and communities in which the projects work. These trainings should follow international best practices on proper medical waste handling.

The World Health Organization has several resources available for checklists and guidance on international best practices in the safe management of health care waste. Annex E is a Healthcare Waste Management Minimal Program Checklist and Action Plan template that can be included in training programs. Also included in this guidance document (Annex F) is an example of a disposal and treatment methods table showing suitable methods of disposal for different categories of healthcare waste.

Additional information for guidance on including safe management of healthcare waste into training programs is available at: <http://www.healthcarewaste.org/home/>

ANNEX A: ENVIRONMENTAL VERIFICATION FORM

1. Name of Project:	
2. Name of Prime Implementing Organization:	
3. Legal Name of Subawardee Organization:	
4. Legally Registered Address of Subawardee: Telephone: E-mail: Website:	
5. Geographic Location of USAID-funded Activities (Province, District):	
6. Date of Screening:	
7. Funding Period for this Subaward:	
8. This Report Prepared by Name: Title: Date:	
9. Date of Previous EMMP for this organization (if any):	

Indicate if your organization will be implementing any activities listed below:

Key Elements of Program/Activities Implemented [Insert each of the general categories of activities requiring mitigation measures based on the IEE in each of the rows below. Remove or add rows as needed]		Yes	No
1	Insert Element 1		
2	Insert Element 2		
3	Insert Element 3		
4	Insert Element 4		
5	Insert Element 5		

CERTIFICATION

I certify the completeness and the accuracy of the mitigation and monitoring plan described above for which I am responsible and its compliance with the IEE:

Signature	Date
Print Name	Title
Organization	

FOR [Insert prime organization's name here] USE ONLY	
Date Received:	
Received By:	

Solicitation Number:	
Subaward Number:	

FOR USAID USE ONLY	
Agreement Officer's Representative: Date:	
Mission Environmental Officer: Date:	
Bureau Environmental Officer: Date:	
Regional Environmental Advisor: Date:	

ANNEX B: EXAMPLE OF PROJECT EMMP

Category of Activity	Describe specific environmental threats of your organization's activities	Description of Mitigation Measures for these activities	Who is responsible for monitoring	Monitoring Indicator	Monitoring Method	Frequency of Monitoring
I. Procurement, storage, transport, management and disposal of public health commodities, including pharmaceutical drugs, immunizations and nutritional supplements, and laboratory supplies and reagents.	The disposal of health commodities procured by the project may have negative environmental impacts.	Provision of Manufacturers Materials Safety Data Sheet (MSDS), outlining disposal requirements for the items, to all consignees for products procured with project funds.		Product-specific information documenting disposal requirements provided to consignee with shipping documents	Review of procurement records	Annual
		Product recipients will be advised that disposal of damaged or expired goods should be returned to the manufacturer where possible; otherwise disposal should follow guidelines provided in the WHO document <i>Guidelines for Safe Disposal of Unwanted Pharmaceuticals During and After Emergencies</i> .		Other waste management guidelines provided to recipients during technical assistance for system strengthening	Review of technical assistance records	
		Provision of the Healthcare Waste Management Minimum Program Checklist and Action Plan (Annex E) to the recipient.				

2. Training professional and paraprofessional health care workers in methods that result in the generation and disposal of hazardous or highly hazardous medical waste (e.g., proper storage of essential medicines and/or public health commodities)	Improper disposal of sharps or other highly infectious health care waste may have negative environmental impacts.	Provision of the Healthcare Waste Management Minimum Program Checklist and Action Plan (Annex I)		Inclusion of pertinent health care waste management guidelines in relevant training materials	Review of training materials	Annual
		Incorporation of WHO Environmental Guidelines for Small Scale Activities in Africa Chapter 8, "Healthcare Waste: Generation, Handling, Treatment and Disposal" and other pertinent guidelines into relevant training materials				
3. Small Scale Water and Sanitation Activities	Poorly designed water and sanitation activities may have negative environmental impacts, including destruction of natural ecosystems and contamination of water sources.	Activities conducted with regard to good design and implementation practices and with consideration of protecting human health and the surrounding environment, as outlined in Environmental Guidelines for Small Scale Activities in Africa, Chapter 16: Water and Sanitation.		Documented Environmental Due Diligence checklist prepared and reviewed		
		Water quality assurance and water testing when applicable.		Water quality protocols and testing results available.		

<p>4. Small Scale Gardening/Farming Activities</p>	<p>Gardening and farming activities may produce negative environmental impacts, including water nitrification/eutrophication, unwanted competition or predation on native species, ecological destruction of habitats critical to the survival of threatened or endangered species.</p>	<p>Activities will be conducted considering minimum impact to local habitat, avoiding introduction of non-native species and genetically modified organisms, and protecting human exposure to animal waste and viruses.</p>		<p>Documented Environmental Due Diligence checklist prepared and reviewed</p>		
<p>5. Small-scale rehabilitation of health facilities including medical stores.</p>		<p>As part of the selection/screening for potential sites, the implementer will perform Environmental Due Diligence for proposed sites to ensure it is free of environmental concerns including those from offsite sources.</p> <p>The majority of materials used will be of local origin and will not contain any hazardous materials (e.g., asbestos or lead).</p>		<p>Documented Environmental Due Diligence checklist prepared and reviewed</p>		

ANNEX C: TEMPLATE EMMP

Environmental Monitoring and Mitigation Plan Template

Category of Activity [Insert the general categories of activities requiring mitigation measures listed in the EVF in each of the rows below. Remove or add rows as needed.]	Describe specific environmental threats of your organization's activities	Description of Mitigation Measures for these activities	Who is responsible for monitoring	Monitoring Indicator	Monitoring Method	Frequency of Monitoring
1. Insert Category 1						
2. Insert Category 2						
3. Insert Category 3						
4. Insert Category 4						
5. Insert Category 5						

CERTIFICATION

I certify the completeness and the accuracy of the mitigation and monitoring plan described above for which I am responsible and its compliance with the IEE:

Signature	Date
-----------	------

Print Name		Title
Organization		

FOR [Insert prime organization's name here] USE ONLY	
Date Received:	
Received By:	
Solicitation Number:	
Subaward Number:	

FOR USAID USE ONLY	
Agreement Officer's Representative: Date:	
Mission Environmental Officer: Date:	
Bureau Environmental Officer: Date:	
Regional Environmental Advisor: Date:	

ANNEX D: ENVIRONMENTAL MONITORING AND MITIGATION REPORT TEMPLATE

Environmental Monitoring and Mitigation Reporting Form

List each Mitigation Measure from column 3 in the EMMP Mitigation Plan (EMMP Part 2 of 3)	Status of Mitigation Measures	List Any Outstanding Issues Relating to Required Conditions	Remarks

CERTIFICATION

I certify the completeness and the accuracy of the mitigation and monitoring plan described above for which I am responsible and its compliance with the IEE:

Signature		Date
Print Name		Title
Organization		

FOR [Insert prime organization's name here] USE ONLY	
Date Received:	
Received By:	
Solicitation Number:	
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Agreement Officer's Representative: Date:	
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Regional Environmental Advisor: Date:	

ANNEX E: WORLD HEALTH ORGANIZATION HEALTHCARE WASTE MANAGEMENT MINIMAL PROGRAM CHECKLIST AND ACTION PLAN – TO BE INCLUDED IN TRAINING MATERIALS/PROGRAMS

Elements/Actions	In Place?	Next Steps to be done		
		What	By Whom	By When
Written plans and procedures				
<p>1. A written waste management plan</p> <p>Describing all the practices for handling, storing, treating, and disposing of hazardous and non-hazardous waste, as well as types of worker training required.</p>				
2. Internal rules for generation, handling, storage, treatment, and disposal of healthcare waste.				
3. Clearly assigned staff responsibilities that cover all steps in the waste management process.				
4. Staff waste handling training curricula or a list of topics covered.				
5. Waste minimization, reuse, and recycling procedures.				
Staff Training, Practices, and Protection*				
<p>6. Staff trained in safe handling, storage, treatment, and disposal.</p> <p>Does staff exhibit good hygiene, safe sharps handling, proper use of protective clothing, proper packaging and labeling of waste, and safe storage of waste?</p> <p>Does staff know the correct responses for spills, injury, and exposure?</p>				
7. Protective clothing available for workers who move and treat collected infectious waste such as surgical masks and gloves, aprons, and boots.				

<p>8. <i>Good hygiene practices.</i> Are soap and, ideally, warm water readily available workers to use and can workers be observed regularly washing?</p>				
<p>9. <i>Workers vaccinated against viral hepatitis B, tetanus infections, and other endemic infections for which vaccines are available.</i></p>				
<p>Handling and Storage Practices</p>				
<p>10. <i>Temporary storage containers and designated storage locations.</i> Are there labeled, covered, leak-proof, puncture-resistant temporary storage containers for hazardous healthcare wastes?</p>				
<p>11. <i>Minimization, reuse, and recycling procedures.</i> Does the facility have good inventory practices for chemicals and pharmaceuticals? Examples include:</p> <ul style="list-style-type: none"> • use the oldest batch first; • open new containers only after the last one is empty; • procedures to prevent products from being thrown out during routine cleaning. 				
<p>12. <i>A waste segregation system.</i> Is general waste separated from infectious/hazardous waste? Is sharp waste (needles, broken glass, etc.) collected in separate puncture-proof containers? Are other levels of segregation being applied e.g. hazardous liquids, chemicals and pharmaceuticals, PVC plastic, and materials containing heavy metals (these are valuable, but less essential)?</p>				
<p>13. <i>Temporary storage containers and designated storage locations.</i> Are there labeled, covered, leak-proof, puncture-resistant temporary storage containers for hazardous healthcare wastes? Is the location distant from patients or food?</p>				

<i>Treatment Practices</i>				
<p><i>14. Frequent removal and treatment of waste</i></p> <p>Are wastes collected daily?</p> <p>Are wastes treated with a frequency appropriate to the climate and season? Warm season in warm climates within 24 hrs; cool season in warm climates within 48 hrs; and warm season in temperate climates within 48 hrs.</p>				
<p><i>15. Treatment mechanisms for hazardous and highly hazardous waste. (The most important function of treatment is disinfection).</i></p> <p>Are wastes being burned in the open air, in a drum or brick incinerator, or a single chamber incinerator?</p> <p>If not are they being buried safely (in a pit with an impermeable plastic or clay lining)?</p> <p>Is the final disposal site (usually a pit) surrounded by fencing or other materials and in view of the facility to prevent accidental injury or scavenging of syringes and other medical supplies?</p>				
<p><i>17. If the waste is transported off-site, are precautions taken to ensure that it is transported and disposed of safely?</i></p>				

* Training should be conducted before starting activity implementation

For more detailed checklists and guidance consult: Safe management of wastes from health-care activities, edited by A. Prüss, E. Giroult and P. Rushbrook. Geneva, WHO, 1999, http://www.who.int/water_sanitation_health/Environmental_sanit/MHCWHanbook.htm. English

ANNEX F: DISPOSAL AND TREATMENT METHODS SUITABLE FOR DIFFERENT CATEGORIES OF HEALTHCARE WASTE TO BE INCLUDED IN TRAINING

Materials/Programs (EXAMPLE)

Method	Infectious Waste (laboratory cultures, excreta)	Sharps (needles, blades, broken glass)	Pharmaceutical Waste (expired pharmaceuticals, boxes contaminated by pharmaceuticals)	Chemical Waste (laboratory reagents, solvents)	Radioactive Waste (unused liquids from laboratory research)
Rotary kiln	✓	✓	✓	✓	✓ ²
Pyrolytic incinerator	✓	✓	✓ ¹	✓ ¹	✓ ²
Single-chamber incinerator	✓	✓			✓ ²
Drum or brick incinerator	✓	✓			
Chemical disinfection	✓	✓			
Wet thermal treatment	✓	✓			
Microwave irradiation	✓	✓			
Encapsulation		✓	✓	✓ ¹	
Safe burial on hospital Premises	✓	✓	✓ ¹	✓ ¹	
Sanitary landfill	✓		✓ ¹		
Discharge to sewer			✓ ¹		Low-level liquid waste
Inertization			✓		
Other			Return to supplier	Return to supplier	Decay by storage

1: Small quantities only.

2: Low-level infectious waste.

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