



USAID
FROM THE AMERICAN PEOPLE

ENVIRONMENTAL COMPLIANCE AND ENVIRONMENTALLY SOUND DESIGN AND MANAGEMENT: FIELD-BASED TRAINING FOR USAID/SOUTH SUDAN AORs AND CORs



This document was prepared by The Cadmus Group, Inc. under USAID's Global Environmental Management Support Program, Contract Number GS-10F-0105J, The contents are the sole responsibility of the authors and do not necessarily reflect the views of USAID or the United States Government.

Photo Credit: Charles Hernick, 26 June 2013

Photo of AORs/CORs examining a wetland adjacent to a section of the Gumbo - Rajaf East Road Pavement Performance Trial Section funded by USAID and implemented by the United Nations Office for Project Services (UNOPS).

WORKSHOP TRAINING REPORT

GEMS ACTIVITY REPORT

AF2: ENVIRONMENTAL COMPLIANCE AND ENVIRONMENTALLY SOUND DESIGN AND MANAGEMENT: FIELD-BASED TRAINING FOR USAID/SOUTH SUDAN AORs AND CORs.

JUBA, 24-27 JUNE 2013

Prepared by:

Charles Hernick, The Cadmus Group, Inc. (charles.hernick@cadmusgroup.com)

Jane Kahata, Consultant to The Cadmus Group, Inc. (jkahata@yahoo.com)

Prepared under:

The Global Environmental Management Support Project (GEMS), Award Number AID-OAA-M-11-00021. The Cadmus Group, Inc., prime contractor (www.cadmusgroup.com).



DISCLAIMER

The author's views expressed in this publication do not necessarily reflect the views of the United States Agency for International Development or the United States Government.

CONTENTS

BACKGROUND AND OVERVIEW	1
GENERAL WORKSHOP DESCRIPTIONS.....	1
OVERALL GOAL OF THE WORKSHOP.....	1
SUMMARY OF GOALS, OBJECTIVES AND METHODOLOGY TO TRAINING DELIVERY.....	2
AOR/COR OPENING DISCUSSION NOTES	2
PARTICIPATORY COURSE EVALUATION (TAKE HOME POINTS FROM TRAINEES)	4
FOLLOW UP ACTION PLAN.....	8
ATTACHMENT 1: KEY CONTACTS.....	10
ATTACHMENT 2: LIST OF PARTICIPANTS	11
ATTACHMENT 3: AGENDA	13
ATTACHMENT 4: PHOTOS.....	15

BACKGROUND AND OVERVIEW

A 4-day field based training on “Life of Project Environmental Compliance and Environmentally Sound Design and Management (ESDM)” was held in June 2013 in an effort to help bridge some of the environmental compliance gaps identified in an Environmental Best Practices Review Report (BPR) conducted in 2009. The training followed on one 3–day training workshop and two 3-hour/brief orientation courses on “Life of Project Environmental Compliance and Environmentally Sound Design and Management” for about 60 USAID/South Sudan staff and implementing partners (IPs) in January 2013. This structure helped provide training to as many participants as possible and still allowed attendees (USAID & IPs) to meet work obligations of the staff. The Global Environment Management Support (GEMS) project, a USAID capacity building project provided support to the training in terms of trainers/facilitators and provision of training materials.

GENERAL WORKSHOP DESCRIPTIONS

USAID STAFF AND IMPLEMENTING PARTNERS WORKSHOP

The **USAID/South Sudan AOR/COR Field Based Training** was held from the 24-27 June 2013 at the MSI compound in Juba, South Sudan. The training comprised of a one-day classroom refreshers and EMMP development exercise for all staff , followed by three days of site visits. As summarized in the table below, in total, 13 AORs/CORs attended the classroom training and between two and eight attended each of the site visits.

DATES	TRAINING BLOCKS	AORS/CORS IN ATTENDANCE
Monday 24 th June	1 day classroom training for all AORs/CORs	13
Tuesday 25 th June	Eye radio station in Juba	8
	Medical stores in Juba	6
Wednesday 26 th June	Road performance trial section along Gumbo – Rajav Road in Juba	6
Thursday 27 th June	Bereka primary school in Lainya County	4
	Ganji IFDC program in Juba county	2

OVERALL GOAL OF THE WORKSHOP

The overall goal of the workshop was to strengthen Environmentally Sound Design and Management of USAID-funded activities in South Sudan by assuring that participants have the motivation, knowledge and skills necessary to (i) achieve environmental compliance over life-of-project, and (ii) integrate environmental considerations in activity design and management to improve overall project acceptance and sustainability.

Strengthen capacity of AORs/CORs in monitoring implementation of environmental management conditions identified in the IEEs.

SUMMARY OF GOALS, OBJECTIVES AND METHODOLOGY TO TRAINING DELIVERY

GOAL	OBJECTIVE	HOW ACHIEVED – REFERENCE TO COURSE AGENDA ATTACHED*
1. Motivating LOP environmental compliance.	<ul style="list-style-type: none"> Articulate the ESDM concept and common causes of failure to achieve ESDM. Explain why ESDM must be a necessary and explicit objective for successful development. 	<ul style="list-style-type: none"> Presentation and discussion covering environmental motivations and causes of environmental failure
2. Mastering Compliance Requirements.	<ul style="list-style-type: none"> Develop and critique environmental mitigation and monitoring plans. Demonstrate basic proficiency in developing environmental mitigation and monitoring plans. Articulate the environmental compliance reporting requirements attendant to EMMP implementation. 	<ul style="list-style-type: none"> Translating IEE conditions into specific EMMP Implementation Field site visit with focus on EMMP implementation
3. Understanding Key sector specific best practices	<ul style="list-style-type: none"> Key compliance issues and best practice: Health sector Roads Agriculture Construction/Rehabilitation 	<ul style="list-style-type: none"> Translating IEE conditions into Specific EMMP Implementation Field site visit with focus on monitoring EMMP implementation
4. Improving Compliance Processes.	<ul style="list-style-type: none"> Evaluate strengths and weaknesses of environmental compliance implementation. Undertake or propose improvements to these processes. 	<ul style="list-style-type: none"> Taking stock of environmental compliance in the Mission indicating the constraints/challenges encountered ; and ways and means of improving on it Field site visit with focus on EMMP implementation

AOR/COR OPENING DISCUSSION NOTES

To get a perspective of Mission’s environmental compliance status as well as understand challenges and constraints CORs/AORs encounter in implementing their environmental oversight responsibilities, a 30 minutes interactive session was held prior to the commencement of the 1 - day training. The feedback from this session is enumerated below:

- Several AORs/CORs noted that they do not/cannot make many field trips due to in-office workloads. Some of them try to make it to the field once or twice a quarter, while others typically cannot.
 - As a result, retroactive compliance monitoring is commonplace, not just from an environmental standpoint, but also from an overall project success standpoint.
 - Due to the delays in carrying field visits, AORs/CORs get to observe certain problems/issues with project implementation long after they have occurred and they have to figure out how to mitigate damage already done.
- The Health team visits the field more often than the others, however, the AORs/CORs are usually uncertain about actions they should take so as to remedy improper waste management. This is the case in many of the health sector projects that are funded through existing health care facilities, where they are a small component of the overall activity in the hospital. For example, funding additional disease testing activities at a clinic or hospital will add medical waste to the existing waste stream (whether it is appropriately managed or not). In addition, small quantities of waste streams also have the potential to have cumulative impact if they are not managed properly. Key questions arising from this scenario are:
 - Should AORs/CORs take responsibility of the hospital's entire waste management stream? In addition, managing only the waste stream generated by the USAID funded activity does not address the problem and creates the impression that USAID did not any implement environmental compliance measures.
 - If USAID is only funding a small portion of a large project, how will the managers of the large project feel when they are pushed (from an environmental compliance standpoint) by a minority USAID funding stream?
 - If USAID staff only focused on the waste stream that they generate, how does an outsider know that they are not negligent about waste management and that the wastes seen are caused by the other hospital operations?
- Sometimes the assumptions made in the IEEs are very different from what is feasible on the ground. For example, the IEE may assume that wastes will be handled using existing effective systems, but in reality, the existing (waste management system) may be inadequate or lacking.
- Most of the IEEs or EMMPs are prepared as a prerequisite to project initiation, however, such documents get forgotten once funding is given and implementation commences due to the following:
 - Environmental compliance documents are signed by senior management in USAID who never communicate to the IPs the environmental management conditions that should be implemented. Since the IPs are not made aware of the need to implement these conditions, they do not bother with their implementation.

- AORs/CORs are the only USAID staff with the knowledge and power to shape the project and make it implemented properly, therefore, if they do not play this role effectively, then an opportunity to make the necessary improvements is lost.
- The Mission has two officers assigned the role of ensuring environmental compliance (MEO/DMEO). Both of them are also AORs/CORs or alternate, and therefore have assignments that take most of their time. This means that they cannot effectively monitor environmental compliance during project implementation in the field, or even do desk reviews.
- AORs/CORs expressed concern that they do not have the expertise to review projects in the field from an environmental standpoint. They were concerned that the MEO does not have time to provide this expertise either.
- Quite a number of the AORs/CORs rely heavily on the IPs and engineering teams to implement their projects especially construction activities. As such, they have limited time in the field to evaluate environmental impacts.
- AORs/CORs expressed a desire to carry out environmental compliance monitoring activities in the field and report back to the MEO, but they cannot because there is no time for field visits.
- Following the January training courses, at least one of the AORs reported having reviewed the IEEs covering the projects they are managing, after which, they held discussions with the respective IPs. In addition, the AOR also conducts field inspections with an eye towards the environment.
- After the January training, the education office now integrates environmental issues into project design. They also make reference to the IEEs conditions during the bidding process.
- Some of the AORs/CORs felt that the MEO should be invited to participate in their field visits for purposes of reviewing environmental compliance issues, however, time would be a constraint on the part of the MEO.
- AORs/ CORs currently only look to MEO when there are issues.

PARTICIPATORY COURSE EVALUATION (TAKE HOME POINTS FROM TRAINEES)

FOLLOWING CLASSROOM SESSION (DAY 1)

INCREASE IN BASELINE KNOWLEDGE

- EMMPs can only be developed with field knowledge. They should be considered living documents.
- Environmental compliance language is especially important for IPs and their sub-contractors.

- The development of an EMMP is an evolving process; AORs/CORs should closely work with IPs to ensure that EMMPs are as useful as possible.
- When monitoring in the field, it is important to check if (1) mitigation measures were implemented successfully as indicated in the EMMP; and (2) if they are effective.
- Historically, there has been little or no emphasis on the efficacy of the mitigation measures.
- Learned the difference between sector-wide IEEs, ERFs (old process), and project-specific IEEs.

REMAINING CONCERNS (TO BE ADDRESSED IN THE FIELD)

- Need additional guidance on what makes a quality EMMP.
- The details of the full environmental compliance process required by Reg 216 are still unclear (from a trainee with no previous environmental compliance/Reg 216 training).

FIELD VISITS (DAYS 2-4)

PROJECT-RELATED LESSONS LEARNED

Schools

- Need to ensure planning for shared bore holes, particularly how to establish management systems on the front-end.
- Need to consider if latrines will be utilized by the community after hours. If so, shared management systems should be planned.
- Waste management has not been a historical focus for the Education Team. While resources are typically so scarce that little is wasted, waste needs to be managed appropriately.

Roads

- In the case of road construction activities, decommissioning of project activities after contract end is dependent on the agreements between the community and the IPs and/or the sub contractors. For example, some of the facilities in a construction camp could be converted to some other community use. However, it is a USAID South Sudan policy that all borrow pits be decommissioned as per the borrow pits management plan prepared by the Mission. In the case where construction camps are established and /or owned by sub contractors, the IP has oversight responsibility during the decommissioning process to ensure compliance with the EMMP.
- Proper storage of road construction materials such as bitumen should be made so as not to degrade its quality.
- In construction camps, care should always be undertaken to minimize spillage of oils and diesel.

- Where sub contractors are engaged by an IP, it is important that the IP shares a copy of the EMMP with the contractor. The contractor then should develop their own EMMP that ensures the overall EMMP is implemented. In addition, the IP should ensure that the sub contractors receive appropriate training for effective EMMP implementation.
- While the sub contractors make efforts in providing PPEs, the workers are reluctant to wear them, which exposes them to occupational health and safety risks. There should therefore be enforcement of the Occupational health and safety requirements.
- Road signage is critical during road construction activities to minimize accidents. Where construction materials are dumped on a road segment waiting to be utilized, there should be warning signs to road users.

Medical Stores

- Adequate and proper storage is critical for medical supplies. In the stores visited, the opposite was observed and this can lead to huge losses. For example, temperatures in some of the stores were very high due to failure of the air conditioning system, while other supplies were not on pallets.
- Pallets could at times introduce pests into a country. As such, there is need to inspect them and if any pests are detected, then the pallets should be destroyed immediately.
- Proper inventorying of what is available in the stores before making additional purchases is important so as to avoid waste through expiration. There should also be a good system that ensures that procurement is need based and there are mechanisms for distributing supplies to the units where they are needed most.
- Pests and vermin should be controlled within and around the stores to avoid losses. Rodents were noted to be a common problem around the stores while some of the stores where timber had been used were infested with termites.

IFDC Seed Project

- While improved seeds are noted to be a major input to improving agricultural productivity, a project providing seeds as inputs would be more beneficial to the farmers if there is a fairly well established extension service. Otherwise, productivity may be affected by other factors such as diseases and inappropriate land management practices. In the farms visited, the maize was found to be infected with pests and there was cross transmission of the same between Okra and the maize (farmers were intercropping the two).
- It was reported that some of the maize seeds given to the community were of a poor quality. This should be verified through field monitoring of any new stock of seeds being distributed. Besides the provision of seeds, farmers need support with regard to the timing for planting (perhaps the above mentioned problem arose due to late planting or failure of the rains).

Eye Radio Station

- Better funding leads to better implementation of EMMP.
- Satisfactory EMMP implementation is possible if COPs are committed to environmental compliance. It is also important that the necessary mitigation measures are incorporated in project design and where possible implemented during the construction phase.

AOR/COR Role-Related Lessons Learned

- Capacity development needs to be implemented and monitored too.
- EMMP field monitoring should commence with a review of relevant documents starting with the EMMP itself. For example, field inspection for the IFDC seed project only reveals project details at the distribution point and at farm level, but does not reveal details pertaining to the necessary GoSS approvals and certificates (the AOR/COR should first check on this in the IPs office before proceeding to the field).
- At the design stage, there is need to integrate activities well with the existing extension services where needed. This ensures the farmer gets support from the time they plant the seeds till harvest time.
- IPs conceal information about the status of projects if they know USAID will not check up on them in the field. COR/AOR should demand some photos from IPs as a means of verifying what is reported in the progress reports with regard to monitoring EMMP implementation.
- IPs need to either (1) hire an environmental specialist to ensure EMMP implementation, or (2) ensure that implementation is delegated to someone who can regularly monitor.
- Environmental compliance requirements need to be written into contracts/agreement instruments. Where the IP is working with sub-contractors, the same should be trickled down to ensure smooth implementation.
- There is need to integrate environmental compliance into the Mission's monitoring and evaluation program which is to be implemented by the Management Systems International (MSI) once their contract has been initiated. For this to work effectively, AORs/CORs should effectively communicate their environmental compliance needs to MSI. This should also include furnishing MSI with the respective documents (IEEs & EMMPs). In addition, a training geared towards understanding pertinent issues with regard to environmental compliance is essential for the contractor.
- AORs/CORs need to take more time in the field to actually observe environmental issues and ensure they are being addressed.
- The Sector Environmental Guidelines are a critical resource that the Education Team was not aware of before the training.
- The field-based training provides a pragmatic approach and prioritizes the environment in appropriate terms for education projects.

Mission Management-Related Lessons Learned

- Mission management should continuously emphasise the importance of environmental compliance which should be integrated early into project design, as well as the need to monitor compliance for purposes of enhancing project success. This should help

minimize AORs/CORs lapses in the implementation of environmental compliance, which has been observed even after training.

- Need to look at the Mission's site visit template and add environment to it (currently the Mission has a separate environment-oriented site visit template).
- Mission should ensure that the progress report template has a section on environmental compliance.
- The MEO needs to be engaged on a full time basis. AORs/CORs are concerned that the MEO cannot provide enough assistance/advice to all projects, plus manage their own full portfolio of projects (i.e., MEO and DMEO are also AORs/CORs or Alternates).
- Sustenance of implementation of mitigation and monitoring measures largely depends on how well a program is funded and for how long. Better EMMP implementation was observed in the Eye Radio station. If robust environmental management systems are not put in place and adequate funding provided to the recipients of USAID's assistance during project implementation, then environmental best practices are quickly forgotten at the end of project implementation. Where such activities have been branded, poorly and/or lack of management of environmental concerns gives a bad image to USAID.

DISCUSSION

The January training did create a fairly good level of awareness about environmental compliance, however, to sustain the momentum generated so far, there is need for AORs/CORs to continue with follow up activities that should be focused on the following:

- Ensuring that EMMPs are prepared for all activities with Threshold Determinations of Negative with Conditions and or positive Determination;
- Contracts should also ensure that such conditions are included in Contracts/Agreement documents;
- AORs/CORs should ensure IPs is reporting on environmental compliance in project progress reports. The best way of ensuring that this does happen is to include a section on the subject in the format of the progress reports.
- The field visit form should include environmental compliance as one of the things to consider on any field trip. Field visits should be supported with photos that highlight major observations on the ground.
- MEO should become a full time position to facilitate greater oversight.

FOLLOW UP ACTION PLAN

The following recommendations should be implemented so as to enhance environmental compliance in the Mission:

1. Need to look at the Mission's site visit templates and add environment to it (currently the Mission has a separate environment-oriented site visit template).
2. The Sector Environmental Guidelines should be promoted as a key resource for AORs/CORs.

3. The Mission should strive to integrate environmental compliance (EMMP implementation) monitoring into project M&E. The MSI M&E contractor provides an excellent opportunity to do achieve this.
4. More of the AOR/CORS should receive the field based EMMP implementation training, especially from the Health team which only sent 1 AOR. In future, new AOR'COR should also be given such training.
5. AOR/CORs should always make IPs aware of the need to fully involve their sub contractors on matters of environmental compliance, the starting point of which should be to provide them with the project EMMP which they should translate to their own plans.

ATTACHMENT 1: KEY CONTACTS

ORGANIZATION	NAME AND POSITION	CONTACTS
USAID/AFR/SD	Brian Hirsch, AFR BEO & COR for GEMS	bhirsh@usaid.gov
CADMUS/GEMS	Mark Stoughton	mark.stoughton@cadmusgroup.com
	Charles Hernick	charles.hernick@cadmusgroup.com
USAID/S.Sudan	Richard Nyarsuk– MEO, AOR-RAPID	rnyarsuk@usaid.gov
	Mary Laku – Alternate MEO, AOR – IFDC, COR FARM	mlaku@usaid.gov

TRAINING/FACILITATION TEAM

LEAD GEMS TRAINER & FACILITATOR	Lead Trainer/Facilitator: Jane Kahata (Consultant to The Cadmus Group)	jkahata@yahoo.com
	Trainer/Facilitator: Charles Hernick (The Cadmus Group, GEMS)	Charles.hernick@Cadmusgroup.com

CONTRACTS, FUNDING AND COST-SHARES

PARTICIPANT SUPPORT	<p>USAID South Sudan Via GEMS provided:</p> <ul style="list-style-type: none"> • Course preplanning • Training materials • Support to the training/facilitation team (travel, per diems and consultant fees)
TRAINING SUPPORT	<p>USAID South Sudan Provided:</p> <ul style="list-style-type: none"> • Transport to field case study sites • Coordination, preparations and Logistical support in arranging for the field visits

ATTACHMENT 3: AGENDA

FIELD TRAINING FOR AORS/CORS: 24-28 JUNE 2013

USAID/South Sudan compliance-oriented field training for AORs and CORs builds off of the January 2013 “Life-of-Project Environmental Compliance and Environmentally Sound Design and Management (ESDM)” training workshops. As the individuals with primary responsibility for environmental compliance of the projects and activities under their purview, the **objective** is to teach CORs and AORs field inspection best practices to ensure environmental compliance. The training will cover sector-specific best practices not covered previously (and identified as an ongoing training need) and link practices to development objectives in South Sudan. This will be conducted by providing an overview of sector-specific best practices in a **classroom** setting, and through **field visits** to assess EMMP implementation.

ITINERARY

1 DAY CLASSROOM TRAINING FOR ALL AORS/CORS	
Monday 24 th June	<p>Venue: Large conference room, M & E facility</p> <p>9:00am <i>Life-of-Project Environmental Compliance for Environmentally Sound Design and Management Short Course (Presentation with Q&A)</i></p> <p>Exercise: Translating IEE conditions to EMMP</p> <p>12:30pm <i>Lunch – on your own</i></p> <p>1:30pm <i>Environmental Impact Assessment Skills: Environmental Monitoring & Environmental Mitigation and Monitoring Plans (Presentation with Q&A)</i></p> <p>2:30pm <i>EMMP Group Work</i> Review field site briefing, complete EMMP template (translating conditions to mitigation and monitoring measures). Site briefings capture common IEE conditions—broader based than the site visits—to bring to the fore common issues arising from sector activity implementation.</p> <ul style="list-style-type: none"> A. Health: Munuki PHCC (use Healthcare Waste Sector Environmental Guideline) B. Roads: Pagak-Mathiang Road (use Rural Roads Sector Environmental Guideline) C. Agriculture: Revitalization Program (use Agriculture and Irrigation EGSSA Chapter) D. Construction/Rehabilitation: Radio Station (use Construction EGSSA Chapter) <p>5:00pm Adjourn</p>

FIELD VISITS ITINERARY			
DATES	TRAINING BLOCKS	REMARKS	
Tuesday 25 th June	<p>1. Radio station in Juba (morning) POC - <i>Judith Hakim</i></p> <p>Key Resources:</p> <ul style="list-style-type: none"> • Internews Network EMMP • Visual Field Guide: Construction <p>-----</p> <p>Lunch</p> <p>-----</p> <p>2. Medical Stores in Juba (afternoon) POC - <i>Richard Ojara</i></p> <p>Key Resources:</p> <ul style="list-style-type: none"> • Visual Field Guide: Healthcare Waste <p>Closing Discussion/Evaluation</p>	<p>9am departure</p> <ul style="list-style-type: none"> • Democracy & Governance • Health • OTCM 	
Wednesday 26 th June	<p>3. Road project: performance trial section along Gumbo – Rajav East Road in Juba POC – <i>Richard Nyarsuk</i></p> <p>Key Resources:</p> <ul style="list-style-type: none"> • UNOPTS ERF and EMMP • Visual Field Guide: Rural Roads <p>Closing Discussion/Evaluation</p>	<p>9am departure</p> <ul style="list-style-type: none"> • Economic Growth/Infrastructure 	
Thursday 27 th	<p>4. Primary school in Lainya County (Wonduruba or Bereka) POC - <i>John Ganiko</i></p> <p>Key Resources:</p> <ul style="list-style-type: none"> • Rapid Construction IEE • Visual Field Guide: Construction • Visual Field Guide: Toilets/Latrines (Sanitation) <p>Closing Discussion/Evaluation</p>	<p>5. Ganji IFDC program in Juba county POC – <i>Mary Laku</i></p> <p>Key Resources:</p> <ul style="list-style-type: none"> • Seed IFDC EMMP <p>Closing Discussion/Evaluation</p>	<p>**7am departure**</p> <ul style="list-style-type: none"> • Education team to Lainya County • Economic Growth/Infrastructure team to Ganji Payam

ATTACHMENT 4: PHOTOS



Jane Kahata (trainer) presenting to AORs/CORs in the one-day classroom portion of the training.



Radio station site visit: AORs/CORs discussing project with IP.



Radio station site visit: Drainage canal for rain water



Radio station site visit: Spilled diesel near generator.



Radio station site visit: makeshift outdoor kitchen.



Medical store site visit: Storage facility, with excess storage outside.



Medical store site visit: full storage space lacking ventilation.



Medical store site visit: Cold packs stored outside



Road trial site visit: AORs/CORs with IP and subcontractor at construction camp



Road trial site visit: Latrine at construction camp.



Road trial site visit: Wetland (potentially man-made) adjacent to road



Road trial site visit: Concrete block making at construction camp for road trial.



Road trial site visit: AORs/CORs discussing with IP and contractor at site where trees adjacent to the road will not be disturbed.



A field planted with the seeds distributed by IFDC.



A field just planted with the seeds from IFDC. There is need for provision of extension



Maize intercropped with Okra which enhances transmission of pests



IFDC distributed seeds: The crop is damaged by pests