**As Time Goes By: Considering the Updating of the Rapid Environmental Impact Assessment**

**Abstract**

Work on the Rapid Environmental Impact Assessment (REA) began in 1999. The idea was to provide humanitarian responders with a process for the rapid identification of critical environmental issues which could then be integrated into humanitarian operations, to improve the effectiveness of these operations and reduce collateral environmental damage. At a ripe age of 18, the REA is a mature tool, tested and used in a range of disasters. At the same time, the development of other environmental impact assessment tools and changes to how humanitarian assistance is provided raises the question as to whether the REA is still needed, and if so, to what end. These questions are relevant to an on-going effort to update the REA, moving its process and procedures into the 21st century. The paper briefly reviews the history of the REA, including challenges to its use, and discusses the degree to which the REA can be revised, and what basic criteria such a process should meet when it has been updated.

**Introduction**

Assistance after disaster[[1]](#footnote-1) is intended to save lives, preserve livelihoods which would be otherwise lost without the assistance, and support recovery. The life-saving intent usually overrides other controls on providing assistance, such as procurement rules, environmental screenings, or, in some locations, even due process. The primacy of saving lives over other procedural requirements is often incorporated into regulations, for instance the “notwithstanding” clause used by the U. S. Government in providing international disaster assistance (U. S. Government Printing Office, 2003).

What the primacy of saving lives often means in practice is that assistance providers and affected populations see bypassing normal rules and regulations as justified because of a fear these procedures will create delays which may cost lives and significantly frustrate recovery efforts. In addition, disaster survivors are often driven by an intent to quickly return to the pre-disaster normal and can see normal rules and procedures as slowing this process.

In contrast, evidence has accumulated that not considering the constrains and reviews incorporated into normal rules and regulations can harm to disaster survivors through the provision of poorly design, poorly implemented and poorly managed disaster assistance. This result often is linked to poor or missing consideration of environmental conditions where the disaster assistance is being provided. Typical cases range from deforestation (Shepherd, 1995), to the construction of post disaster housing in a flood zone, to the unsafe disposal of biohazard waste from humanitarian health operations.

Faced with the reality that disaster assistance may be doing harm to those already harmed by a disaster, efforts have increases over the past twenty years to, among other things, provide procedures for the environmental review of disaster assistance, particularly where external assistance is significant and where host government capacities for environmental review may be limited.[[2]](#footnote-2) The remainder of the paper will summarize the development of the Rapid Environmental Impact Assessment in Disasters (REA) process designed to address these conditions, and draw key conclusions about the future of the REA.

**Origins of the REA**

In the late 80s and early 90s, the U. S. and other governments and the UN Food and Agricultural Organization were implementing large programs across Africa to combat locusts and grasshoppers. These programs were the outgrowth of colonial and post-colonial pest control efforts, but also incorporated an expectation that swarming locusts and grasshoppers (hereafter, acridians) were a threat to food security in the aftermath of severe drought and widespread food insecurity in the mid-80s in savannah regions of Africa.

On the U. S. Government side, the acridian control efforts were considered as emergency programs and were not subject to the environmental review procedures normal used by the U. S. Agency for International Development (USAID), which oversaw this assistance. At the same time, some environment impact-related controls were put in place. For instance, USAID-funded assistance tended to favor pesticides and treatment methods used by the U. S. Department of Agriculture, which managed large scale acridian control programs in the U. S., and for which environmental impact assessments (for operational conditions in the US) had been completed.

However, after several years of using the “notwithstanding” authorization (U. S. Government Printing Office, 2003), the USAID locust and grasshopper control program was forced to undertake a formal environmental review. The need for the review was based on the reasoning that you can’t have the same emergency several years running doing much the same activities, and still operate under the immediate life-saving justification of a “notwithstanding” authorization.

At least in Niger, where the author managed the USAID locust and grasshopper control program, the environmental review process was both frustrating and enlightening. Frustrating because of the range of questions asked but also because of the gaps in programming which were identified. Enlighten because of the improvements in the program which the review identified.

In short, the locust and grasshopper program environmental review led to a realization that environmental reviews could actually be used to improve emergency programming and assistance by providing an independent review of what was often hastily designed and implemented emergency assistance. But it was also recognized that any environmental review of disaster assistance had to operate under the same conditions as other disaster assessments, and, most importantly, support a more effective disaster relief and recovery process, or it would be considered irrelevant to those providing assistance and recovering from a disaster.

**Development of the REA[[3]](#footnote-3)**

From its conceptualization in Niger, the REA went through the development steps summarized below.

* Defining the concept, through consultations and conference presentations[[4]](#footnote-4). These efforts, in the late 90s, benefited from an increased awareness of disaster-environment links and attention of the environmental impact of refugees and engagement of Non-Government Organizations in efforts to address the environmental consequences of development[[5]](#footnote-5) and disaster assistance.
* Developing the process. The initial idea was for a two to three page checklist covering salient environmental issues for all types of disaster assistance. What emerged after extensive consultations was a relatively comprehensive process based on the standard environmental impact assessment (EIA), but with modifications to match the disaster context, include:
	+ Trading accuracy for timeliness (as is the case for most post disaster assessments).
	+ Using qualitative data, as reliable quantitative data is generally not available for weeks to months after a disaster.
	+ Using a consensus-based non-expert approach, to reflect the fact that a full range of environmental experts are generally not available immediately after a disaster and to avoid single-expert bias.[[6]](#footnote-6)
	+ Focusing on relief and recovery operational issues, subsequently defined as prioritizing issues which were (a) life threatening, (b) welfare or livelihoods threatening, and, finally, (c) issues which only affected the environment but neither (a) or (b).

This last point was critical to the REA – the explicit focus was on saving lives and preserving livelihoods, even to the extent of accepting that harm might come to the environment as a consequence. Nonetheless, if live-saving harm to the environment was identified in the REA, it would thus be documented and the damage address later in the recovery process.

* Review, Testing and Revisions. The initial REA process when through peer reviews and field testing, first in Afghanistan in 2003, and subsequently in Ethiopia and Indonesia. The REA also went through external reviews and two evaluations (Stone, no date, Alexander and Sutter, 2006).

The REA process held up fairly well through testing, although modifications were needed to be make procedures more understandable (not only to non-native speakers of English). The rating and ranking process switching from scoring using numbers to words to avoid the use of mathematical calculations in ranking the impacts, which created false results.

Concern was also expressed that the REA was too complicated and time consuming, leading to reformatting and efforts to make the process more intuitive. An initial hope that the REA could be done only based on the **Guidelines for Rapid Environmental Impact Assessment** (Kelly, 2005), was not met. It was eventually accepted that at least one person with experience in the REA process should be involved in field use.

* Training and Operational Use. Once a reliable process was worked out and tested, a training program was developed and rolled out together with operational use of the REA. The REA is currently available on English, French and Spanish, with a summary in Russian. The most recent uses of the REA have been in Haiti (Sun Mountain International, 2010) and Chile in (Ministry of Environment, Government of Chile, et al, 2010) and Nepal in 2015 (Ministry of Science, Technology and Environment, 2015).

**Results and Lessons**

After more than two decades of development and use, the REA is a tested tool to identify and prioritize critical environmental issues after a disaster. Yet, the greatest lesson from the development of the REA is that assessments themselves did not always, or even often, result in actions to address the issues identified.

The Haiti assessment (Sun Mountain International, 2010) did lead to some changes in programming and influenced the subsequent efforts by the Shelter Cluster to support the inclusion of environmental issues into rebuilding. But a broad range of issues remained unaddressed. The Darfur assessment (Joint UNEP/OCHA Environment Unit, 2004) likely contributed to the subsequent Tear Fund assessment (Tearfund (2007) and may have encouraged the development of environment-related programming for the displaced populations, but the linkages are indirect. The Chile assessment (Ministry of Environment, et al, 2010) did lead to later consultations with a regional government in recovery, and a recovery project, but it is not clear specific actions were otherwise taken to address the issues raised in the REA itself.

In a context where evidence is supposed to drive programming, there is little documented evidence that the REA’s use has had a significant influence on humanitarian programming or operations. This has real consequences, as decisions to fund a REA are framed by the question of what demonstrated impacts has the REA had in the past.

The same may be the case for other disaster-focused environmental assessment tools. While **FRAME** (CARE International, no date) may have had an impact on refugee-level environmental impacts, it is unclear whether tools such as the **Emergency Shelter Environmental Impact Assessment** (Kelly 2008) or the **Environmental Needs Assessment in Post-Disaster Situations: A Practical Guide** (United Nations Environment Program, 2008) have been used with any regularity, or with any impact. It appears, as with the REA, that there has been a lot of tool making but not much made from the tools.

The crux of the matter seems to be that environment-focused assessments are infrequently required after a disaster. The urgent life-saving justification appears to be used consciously or unconsciously to justify not conducting environmental reviews. There also appears that a lack of knowledge about environmental review procedures of a country or donor, which may, in many cases, require some level of environmental review fairly soon after a disaster.[[7]](#footnote-7),[[8]](#footnote-8)  Even where a REA has been acknowledged as relevant to an organization’s work, the assessment results have infrequently led to an environmental management and monitoring plan,[[9]](#footnote-9) as used for a normal EIA.

**Moving Forward**

Efforts are underway by USAID and the UNEP/OCHA Joint Environment Unit, the two original REA funders, to consider what should be done with the REA (U. S. Agency for International Development, et al, 2017). There is clearly a need to update materials in the REA linked to the **Sphere Standards for Humanitarian Assistance**[[10]](#footnote-10), incorporate developments over the last decade in areas such as land tenure, protection, make the links between gender and environmental impacts clearer, and incorporate a clearer rights-based approach.

In keeping with the ever-present expectation that technology can make life easier, the REA can be adapted for use on electronic devices, with the prospect of speeding data collection and analysis. And the emerging issue of climate change, and the identification of climate smart relief and recovery, can expand the scope of REA analysis and applicability of results to improving overall humanitarian assistance.

The USAID/Joint Unit work may even consider scrapping the current REA and starting clean on a single concept and process which addresses a range of environmental impact assessment requirements following disaster, e.g., combining the REA with other assessment tools to create a common platform and analytical process.

Whatever the future of the REA may be, four considerations should frame the results. First, assessment results should be directly linked to improving the delivery and impact of disaster assistance. The primary purpose should be to help disaster survivors, clear and simple.

Second, the assessment process needs to reflect the scope of a normal EIA. The breadth of coverage found in an EIA is necessary to ensure that significant, and possibly lifesaving, issues are not missed, leading to avoidable harm to disaster survivors. Tunnel vision is a significant challenge in disaster response. The REA forces a considerable widening of this vision.

Third, timeliness will always need to be traded for accuracy. A post disaster assessment needs to deliver usable results in the same timeframe in which the disaster assistance is provided. A comprehensive report late is much worse than a partial report on time.

Finally, the failure to use results needs to be addressed. If it is not, then any future process will have limited impacts on reducing harm to disaster survivors and avoidable damage to the environment. In the end, assessments need to lead to action, or they are not worth doing.

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1. Assistance after disaster can be termed disaster assistance or, when provided externally to a country or population, humanitarian assistance. The former term includes the latter for the purposes of this paper. [↑](#footnote-ref-1)
2. Concerns about the negative impacts of assistance also led to the “do no harm” approach (Collaborative Learning Project, 2004) and increased attention to protection, equity, and gender, among other issues, topics generally linked to the environment. [↑](#footnote-ref-2)
3. Development and use of the REA has been funded by the Royal Gov. of Norway, USAID, the Joint UNEP/OCHA Environment Unit, and in-kind contributions from CARE International with the support of CARE USA and CARE Norge, and others involved in field work. The overall project was managed by the Benfield Hazards Research Center, University College London. The Chile 2010 earthquake REA was funded by Ministry of Environment, Gov. of Chile, World Wildlife Fund – Chile and Antofagasta Minerals. The 2015 Nepal REA was funded by USAID with in kind contributions of the Government of Nepal and WWF. [↑](#footnote-ref-3)
4. Including the Conference on Environmental Issues in Disaster Prevention, Preparedness and Response, The Environmental Response Network, Green Cross UK, London, March 1999, and Sharing Experiences on Environmental Management in Refugee Situations: A Practitioner’s Workshop, UNHCR, Geneva, October 2001. [↑](#footnote-ref-4)
5. The USAID Food for Peace program was instrumental in a deepening the engagement of NGOs in environmental issues through a requirement that food aid programs have environmental reviews. [↑](#footnote-ref-5)
6. UNHCR noted that single experts conducting assessments tended to produce assessment nly specific to their field of knowledge. [↑](#footnote-ref-6)
7. The real time review of the Hurricane Mathew response (Grunewald and Schenkenberg, 2016) did not mention the environment even as the environment was a significant factor in the impact of the hurricane. [↑](#footnote-ref-7)
8. Many donors, UN agencies and countries have some requirement for environmental reviews which would apply fairly soon after a disaster. But documentation of such reviews having taking place is scarce and experience suggests such reviews are rarely done. [↑](#footnote-ref-8)
9. A REA identifies and prioritizes critical environmental issues related to a disaster response but does not develop formal EMMPs, which is the responsibility of agencies implementing response activities. [↑](#footnote-ref-9)
10. http://www.sphereproject.org/ [↑](#footnote-ref-10)