

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

Work on the Rapid Environmental Impact Assessment (REA) began in 1999. The idea was to provide humanitarian responders with a way to rapidly identify critical environmental issues which would then be integrated into disaster assistance, to improve the effectiveness of relief operations and reduce collateral environmental damage. REA is a mature tool, tested and used in a range of disasters. At the same time, the development of other environmental impact assessment tools² and changes to how humanitarian assistance is provided, for instance the Cluster Approach³ and shifts to financial transfers as a preferred relief modality (Overseas Development Institute, 2015), raise the question of what should come out of an ongoing review of the current REA. The paper briefly reviews the history of the REA, summarizes some lessons from the use of the REA and discusses what criteria a revised or new REA should meet to be effective.

Introduction

Assistance after disaster⁴ is intended to save lives, preserve livelihoods which would be otherwise lost without the assistance, and support recovery. The life-saving priority usually overrides other due process controls on providing assistance, such as environmental screenings.

The primacy of saving lives over other procedural requirements is often incorporated into regulations. For instance, the “notwithstanding” clause used by the United States (US) Government permits the provision of immediate lifesaving assistance without a need to follow normal rules and regulations, such as procurement procedures and environmental regulations (US Government Printing Office, 2003).

Assistance providers and affected populations often see bypassing normal rules and regulations as justified given a fear these procedures will create delays that may cost lives. Disaster survivors are often driven by a desire to quickly return to pre-disaster conditions and can see normal rules and procedures as slowing this process.

However, evidence shows that not taking the constraints incorporated into normal rules and regulations into consideration can harm disaster survivors through the provision of poorly designed, poorly implemented and poorly managed disaster assistance. This outcome often is linked to inadequate consideration of environmental issues where the disaster assistance is being provided. Typical examples 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.

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² See http://www.proactnetwork.org/proactwebsite_3/index.php/resources/practitioner-s-resources-kit/environmental-assessments-and-environmental-action-plans for a sample of other tools.

³ See <https://www.humanitarianresponse.info/en/coordination/clusters/what-cluster-approach>.

⁴ 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.

Faced with the reality that disaster assistance may be doing further harm to those already harmed by a disaster, efforts by individuals and environment-focused organizations have increased over the past twenty years to, among other things, provide procedures for environmental review of disaster assistance. This effort has focused on disasters where external assistance is significant and host government capacities for environmental review may be limited.⁵ 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 1980s and early 1990s, the US, other governments and the United Nations (UN) Food and Agricultural Organization were implementing large programs across Africa to combat locusts and grasshoppers (hereafter, acridians). These programs were based on an expectation that swarming acridians were a further threat to food security in the aftermath of severe drought and widespread food insecurity in the mid-1980s in savannah regions of Africa.

The US Government considered acridian control efforts as emergency programs, not subject to environmental review procedures normally followed by the US Agency for International Development (USAID), which oversaw this assistance. However, after several years, the recurrent nature of the acridian problem and the similar responses each year, was judged as no longer meeting the immediate lifesaving justification of the “notwithstanding” authorization, (US Government Printing Office, 2003). As a result, the USAID acridian control programs were required to follow normal USAID environmental review procedures and develop formal environmental reviews.

In Niger, where the author managed the USAID acridian control program, the environmental review process was both frustrating and enlightening. It was frustrating because of the review sought explanations and justifications for what had been largely an ad hoc program. In many cases these were lacking. The review process was enlightening because it identified a range of significant improvements to the program which would reduce negative environmental impacts, but also increase effectiveness.

This experience led to the author realization that environmental reviews could be used to improve disaster assistance by providing an independent review of what was often hastily designed and implemented assistance. But it was recognized that any environmental review of disaster assistance had to operate under the same time and data limited conditions as other disaster assessments, and, most importantly, support a more effective disaster relief and recovery process. If the environmental review process did not meet these requirements it would be considered irrelevant to those providing assistance and recovering from a disaster.

Development of the REA⁶

⁵ Concerns about the negative impacts of assistance led to the “do no harm” approach (Collaborative Learning Project, 2004), with increased attention to protection, equity, and gender, among other issues, topics generally linked to the environment.

⁶ Development and use of the REA was 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.

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

- Defining the concept, through consultations and conference presentations⁷. These efforts, in the late 1990s, 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 development⁸ 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, including:
 - Trading accuracy for timeliness (as is the case for most post-disaster assessments).
 - Using qualitative information, as reliable quantitative data are 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 is generally not available immediately after a disaster and to avoid single-expert bias.⁹
 - Focusing on relief and recovery operational issues, by prioritizing issues that were (a) life-threatening, (b) welfare- or livelihood-threatening, and, finally, (c) issues that affected only the environment but neither (a) nor (b).

This last point was critical – the explicit focus of the REA was on saving lives and preserving livelihoods, even to the extent of accepting that harm might consequently come to the environment. Nonetheless, if the REA identified that immediate lifesaving actions would harm the environment, this assessment would provide a basis for remedial actions at a later stage.

- Review, Testing and Revisions. The initial REA process went 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 made procedures more understandable (including to non-native speakers of English). The ranking process was switched from 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

⁷ 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.

⁸ The USAID Food for Peace program was instrumental in deepening the engagement of NGOs in environmental issues through a requirement that food aid programs have environmental reviews.

⁹ UNHCR noted that single experts conducting assessments tended to produce assessment only specific to their field of knowledge.

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, or directly advise on, 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 in 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 (Ministry of Environment, Government of Chile, et al, 2010) in 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 road-tested tool able to identify and prioritize critical environmental issues after a disaster. Yet, it is not clear the assessments completed have had any significant long term impact on the relief operations which they reviewed.

The Haiti REA (Sun Mountain International, 2010) did influenced work by the Shelter Cluster to support the inclusion of environmental issues (e.g., reducing use of scarce local resources) into rebuilding. But a broad range of issues identified in the REA remained unaddressed, not the least of which was human waste disposal. The Darfur REA (Joint UNEP/OCHA Environment Unit, 2004) likely contributed to the subsequent Tearfund assessment by documenting environmental conditions and highlighting critical issues (Tearfund (2007), and may have encouraged the development of environment-related programming for displaced populations, but the linkages are indirect at best. The Chile REA (Ministry of Environment, et al, 2010) led to later consultations with a regional government in recovery and provided a basis for a recovery project, but it is not clear other actions were taken across the range of topics covered in the assessment.

One issue is that post disaster environment-focused assessments are infrequently required by donors, undertaken by aid organization based on their internal policies, or completed in compliance with national laws or regulations after disasters. Even where a REA has been completed, it does not automatically result in an environmental management and monitoring plan (EMMP), requiring action by those involved in the disaster response. (The REA is designed to identify issues but not to assign corresponding responsibilities to address these issues.)

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 (US 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, to incorporate developments over the last decade in areas such as land tenure and protection (e.g. human safety), to clarify the links between gender and environmental impacts, and to incorporate a clearer rights-based approach.¹¹

¹⁰ <http://www.sphereproject.org/>

¹¹ Details on the rights-based approach to humanitarian assistance can be found at http://www.actionaid.org/sites/files/actionaid/rba_approach_guide.pdf.

The REA can be adapted for use on electronic devices, with the prospect of facilitating data collection and analysis. Consideration of climate change issues in REA analysis could improve overall humanitarian assistance by informing the development of climate-smart relief and recovery programming.

Whether making changes to the current REA process, or developing a new tool based on new expectations and possibilities, four considerations should frame the results. First, assessment results should be designed to improve the delivery and impact of disaster assistance. The primary purpose should be to help disaster survivors, clear and simple, not to generate an assessment report or conduct field research.

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 life-saving or life threatening, issues are not missed, leading to avoidable harm to disaster survivors. Tunnel vision is a significant challenge in disaster response, with responders often not considering indirect, collateral or longer term impacts of their actions. 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 partial qualitative report, early, is much better than a comprehensive report late, particularly as the initial report can be quickly update as a crisis evolves (which is where a robust EMMP can play a significant role).

Finally, results need to be used. This will likely require a combination of more systematically conducting REAs, that is, making them a routine part of humanitarian response, and developing some level of an EMMP process. If results are not used then any future assessment process, however good, 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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