



Office of Inspector General

September 16, 2015

MEMORANDUM

TO: USAID/Office of Foreign Disaster Assistance, Middle East Crisis Humanitarian Response Manager, Alex Mahoney

FROM: Regional Inspector General/Frankfurt, James C. Charlifue /s/

SUBJECT: Management Letter Regarding Environmental Concerns Identified During the Survey of Selected USAID/Office of Foreign Disaster Assistance Programs in Iraq (Task No. 88151715)

On behalf of the Office of Inspector General (OIG), this memorandum transmits a time-sensitive finding regarding environmental concerns identified during a site visit to an internally displaced person (IDP) camp in northern Iraq. We have four suggestions for your immediate consideration.

This memorandum is not an audit report; it was developed during fieldwork for the survey of selected USAID/Office of Foreign Disaster Assistance (OFDA) programs in Iraq. The survey team plans to include these concerns in a survey report after finishing fieldwork. In that report, management will have an opportunity to provide a formal response.

Background

Title 22 of the Code of Federal Regulations, Part 216, provides environmental procedures that USAID must follow to “ensure that the environmental consequences of [USAID] financed activities are identified and considered by [USAID] and the host country prior to a final decision to proceed and that appropriate environmental safeguards are adopted.”

Section 216.2(b)(1)(i), allows USAID activities to be exempted from the regulation when providing international disaster assistance. On June 19, 2014, the U.S. Embassy in Baghdad declared the Kurdistan Region of Iraq as a disaster area,¹ which meant that OFDA’s activities there were exempt from the environmental procedures.

¹ On October 30, 2014, the U.S. Embassy in Baghdad re-declared a disaster in Iraq for the remainder of fiscal year 2015, and officially expanded the disaster area to the whole country at that time.

As of May 18, 2015, OFDA had awarded 21 grants worth \$26.1 million² to 14 organizations to address the humanitarian crisis as a result of the disaster declaration.

Implementing Partner Might Be Disposing of Sludge Inappropriately

According to the Sphere Project,³ generally accepted humanitarian response minimum standards state that when septic tanks are used for toilets, “due consideration should be given to desludging, handling, transportation, and final disposal of the sludge.” They also say, “Desludging of toilets/septic tanks and excreta containers, including siting of final sewage disposal point, needs to be considered right from the start.”

During a site visit OIG made to an IDP camp in northern Iraq on July 21, 2015, an OFDA implementing partner’s engineer described how septic tanks were overflowing more than originally anticipated. So the partner increased the amount of de-sludging activities at the camp to handle the overflow. The sludge was being dumped in a nearby river, the engineer said, and pictures were available of the dump sites. However, OIG had difficulties obtaining corresponding photographic information from OFDA’s partner. We asked the OFDA partner’s country director for the pictures, and several weeks later, he sent several that did not look like sludge disposal sites. We asked the deputy country director about this discrepancy and then more photos were sent, along with histories of two dumping sites. The deputy country director said they were concerned about dumping sludge at the first site so they switched to the second site in May 2015.

The excessive sludge overflow from the IDP camp’s septic tanks, according to the partner, is the result of the camp being hastily built. As a result, the construction, which was not done by the partner, was poor, and the water and sewage systems had major design flaws. Additionally, the local municipality allegedly directed the OFDA partner to dispose of the sludge in designated areas.

The OFDA disaster assistance response team (DART) present during our site visit said they did not know about the sludge disposal sites.

OFDA officials said their ability to monitor implementation activities is limited due to security limitations on site visits, which must be approved by the U.S. Consulate in Erbil. As a result, DART members cannot always monitor and observe the activities of USAID grantees. However, we were able to get permission from the consulate to make site visits.

If OFDA is able to obtain permission for site visits, then this provides an opportunity for OFDA to engage a water, sanitation, and hygiene specialist in Washington, D.C., who would normally help oversee activities like desludging at IDP camps. According to the OFDA partner, this specialist has not conducted any visits outside of Erbil. However, if permission is not granted for site visits, then OFDA could use other methods for monitoring, like an independent contractor.

OFDA may not be required to comply with U.S. laws and regulations related to environmental

² This information does not include OFDA assistance funded through the United Nations.

³ According to the standards’ Web site, Sphere was “initiated in 1997 by a group of humanitarian nongovernmental organizations and the International Red Cross and Red Crescent Movement.” Many OFDA partners follow Sphere’s standards when implementing activities with OFDA grants. (www.spherehandbook.org).

protection abroad because of the previously stated exemption. Yet, this lack of oversight could lead to health and environmental hazards caused by the de-sludging activity that USAID's grant is paying for. Because OFDA grants are funding similar projects in camps and communities throughout Iraq, the problems we have seen at one site could be going on in others.

We cannot determine the basis for the difference between the implementer's photos and the engineer's statements, or determine how widespread this issue could be; thus, we suggest the following actions be taken immediately.

1. We suggest that the Office of Foreign Disaster Assistance independently determine whether sludge from the internally displaced person camp, visited by the Office of Inspector General, is being disposed of improperly and could pose potential environmental or health hazards.
2. We suggest that the Office of Foreign Disaster Assistance independently determine how sludge is being disposed of at other internally displaced person camps or communities in Iraq where septic tanks or other human waste containment methods are being funded or maintained through its grants.
3. We suggest that the Office of Foreign Disaster Assistance independently determine the level of sludge treatment appropriate and necessary at internally displaced person camps in Iraq to make sure it is disposed of according to humanitarian response standards.
4. We suggest that the Office of Foreign Disaster Assistance ask in writing that its partners in Iraq assess how sludge from septic tanks or other human waste containment methods will be de-sludged, handled, transported, and disposed of in the future.