



LAC-IEE-04-03

ENVIRONMENTAL THRESHOLD DECISION

Activity Location : Colombia

Program/Activity Number : SO2 514-008 (527-C-00-01-00091-00)

Program Activity Title : Expanded Strategic Objective: Provide Economic and Social Alternatives to Illicit Crop Production

Sub-activity Name : Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP) for the Colombia Alternative Development (CAD) Program / Chemonics International, Inc.

Funding : \$87,400,000

Life of Project : FY 2000 to 2006

Supplemental IEE and PERSUAP Prepared by : Gabriel Escobar, MEO USAID/Colombia, and Victor Bullen, REO, USAID – South America
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Recommended Threshold Decision : A Negative Determination with conditions

Bureau Threshold Decision : Concur with Recommendation

Comments:

The Threshold Decision is based on the completion by CAD for USAID/Colombia of a PERSUAP for pesticide use, addressing USAID's Pesticide Procedures, pursuant to 22 CFR 216.3 (b)(1)(i)(a - 1). The conditions to this Negative Determination are summarized below. **An overall condition is that the USAID Regional Environmental Advisor for South America will review the compliance to these conditions at least once each year of implementation.**

For future commodities, pests and pesticide products to be considered under the CAD program implemented by Chemonics, but not covered in the present PERSUAP, ***a further condition is stipulated. An amended PERSUAP shall be submitted***, pursuant 22 CFR 216.3 (b)(1)(i)(a - 1). The amended PERSUAP should be submitted to USAID-Colombia MEO and USAID-South America REO within a reasonable amount of time after the bidding process is completed and Chemonics is certain of the crops to be included in the contracts. The amended PERSUAP will be prepared following the instructions that are a component of this PERSUAP (see section 5.5)

and it must be cleared by the USAID-Colombia MEO and USAID-South America REO before submission to the Mission Director for signature and before review by the BEO.

Specific Conditions

1. So far, the majority of the crops supported by CAD have been of low input agricultural systems, ecologically appropriate, with an integrated, if not an ecological or organic, approach to crop production and pest management. **CAD will continue with this eco- friendly approach to the promotion of alternative crops, leading into sustainable development, to the benefit of the Colombian environment and the health of participant farmers and their families, as well as of the consumers.**

2. The promotion of ‘new and legal’ crops in areas where illegal crops have been grown for years involves taking reproductive material, sexual or vegetative seeds, from traditional cropping areas to the new ones. ***In order to prevent the dissemination of contaminated crop seed with pathogens, insect pests, and weed propagules, CAD will establish a strict plant sanitation-quarantine system based on international agreed and ICA certification and quarantine procedures for the movement of plant materials into the country as well as from one region to another within Colombia.***

3. Due to an extremely favorable cost/benefit ratio on the use of pesticides in illicit crops, these growers have a mentality of overusing pesticides in crop production without resorting to a rigorous health or environmental analysis. This is the major challenge that CAD faces in order to promote an environmentally friendly and sustainable alternative development program. To change this situation, ***CAD will follow a multifaceted strategy that (a) supports project operators to make farmers, and their families, fully aware of the health hazards of pesticides; (b) supports project operators, civil society and GOC authorities to make farmers, their families, and the larger Colombian community aware of the environmental hazards, and societal costs, of pesticide abuse and misuse; and (c) provides technical assistance to project operators for them to be able to demonstrate to the participant farmers the options to pesticides available through IPM programs that use the concepts of economic damage and action thresholds.***

4. A few of the pesticides being presently promoted in CAD are considered to pose serious health and environmental risks to Colombians and the Colombia’s environment. ***(a) Some of these pesticides (the insecticides: carbofuran, chlorpyrifos, and profenofos, and the fungicides: chlorothalonil and copper oxychloride shall be phased out in the medium term (1-1.5 years), and replaced by others or, preferably, by no-chemical tactics for pest control. (b) Moreover, due to higher than accepted health and environmental risks, and the availability of pest management alternatives to these molecules, a few of the pesticides (the fungicides: benzimidazole, captafol, hexaconazole, kasugamicine and ofurace, and the insecticides: cyalothrine (lambda), cyfluthrin and methomyl) shall be phased out in the short term (0.5-1 year). (c) The highly toxic and easily replaceable insecticides aldicarb, isazofos, monocrotophos, methyl parathion and methamidophos and the herbicide paraquat shall be***

phased out immediately. (d) And finally, and additionally to this, no product listed in the prohibited pesticides category in the US or Colombia, shall ever be used in this project.

5. In spite of a very solid and modern Colombian pesticide regulatory framework, and in spite of a large cadre of extremely well qualified Colombian agronomists, there is still need and room for interventions on Safer Use of Pesticides (SUP). ***Considering the traditional attitudes and practices of the participant farmers with respect to pesticides, as well as the isolated, and conflictive, condition of the areas where CAD is present, CAD shall implement a very strong SUP program. The program shall (a) be based on the training programs already available in Colombia, such as ‘Agrovida’, by Bayer CropScience, taught for farmers and also their families (women and children), and/or that of SENA-ANDI joint training program for farmers (2 days) and trainers (5 days); (b) attempt to raise ‘awareness’ of the health and environmental hazards of pesticides as well as to teach ‘good practices’ on SUP; and (c) go hand in hand with training in ‘ecological agriculture’ and IPM, so SUP does not become a false panacea. Training offers for both of these latter themes are also available in Colombia through IICA, ICA, Corpoica and the university system.***

6. “Integrated pest management ... is USAID policy because it is the most effective, economical, and safest approach to pest control. IPM attempts to control pests in an economically and environmentally rational manner; it emphasizes non-chemical tactics, which cause minimal disruption of the ecosystem”¹. ***In spite of the good technical level of the field technicians working within CAD and the CAD project operators, technical support in IPM shall be strengthened. This will take the form of (a) an ex-ante requirement for an IPM program for all crops promoted; (b) field demonstrations on the use of non-chemical pest control methods; and (c) support to the technical staff of the operators for farmers training in crop-specific IPM programs.***

_____ Date

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¹ USAID/AFR Guidance: Preparing PERSUAPs for Pesticide Programmes in Africa.