# ENVIRONMENTAL THRESHOLD DECISION

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| **Activity Location** | **:** Colombia |
| **Program/Activity Number** | **:** SO2 514-008 (IQC PCE-I-00-99-00001-00) |
| **Program Activity Title** | **:** Provide Economic and Social Alternatives to Illicit Crop Production |
| **Sub-activity Name** | **:** Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP) for Several Crops of the Colombia Agribusiness Partnership Program (CAPP)/ARD |
| **Funding** | **:** $38,000,000 |
| **Life of Project** | **:** FY 2000 to 2006 |
| **Supplemental IEE and PERSUAP Prepared by** | **:** Gabriel Escobar, MEO USAID/Colombia, and Mario Pareja, Consultant - Environment & Development |
| **Ref** | **:** LAC-IEE-04-03; LAC-IEE-00-15; LAC-IEE-00-16; LAC-IEE-00-35 |
| **Recommended Threshold Decision :** | A Negative Determination with conditions is recommended on the basis of the completion by Colombia Agribusiness Partnership Program (CAPP)/ARD of a PERSUAP for pesticide use, addressing USAID's Pesticide Procedures, pursuant to 22 CFR 216.3 (b)(1)(i)(a - l). This PERSUAP is attached and is an integral part of the IEE. |
| **Bureau Threshold Decision** | **:** Concur with Recommendation |

**Comments:**

The Threshold Decision is based on the completion by CAD for USAID/Colombia of a PERSUAP amendment for pesticide use, addressing USAID's Pesticide Procedures, pursuant to 22 CFR 216.3 (b)(1)(i)(a - l). 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.**

In case future commodities, pests and pesticide products are considered under the CAPP program implemented by ARD, but not covered in the present PERSUAP, **a further general condition is stipulated.  An additional amendment to the PERSUAP shall be submitted**, pursuant 22 CFR 216.3 (b)(1)(i)(a - l).  Any additional amendment to the PERSUAP must be cleared by the USAID-Colombia MEO and USAID-South America REA before submission to the Mission Director for signature and before review by the BEO.   Finally, the **third general condition is that all recommendations (a summary of the 8 new recommendations not included in the CAP PERSUAP is attached) in the present PERSUAP for the CAPP program in Colombia, will be adhered to and all mitigating actions shall be part of ARD's or other implementing agents' contracts or grants.**

CTOs are responsible for making sure environmental requirements are met.  It is the responsibility of the SO Team to ensure that the SOAG and MAARDs or contracts and grants contain specific instructions to this effect.

_____Date_____
George R. Thompson, P.E.
Bureau Environmental Officer
Bureau for Latin America and the Caribbean

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**SUMMARY OF EIGHT NEW RECOMMENDATIONS
FOR
THE PERUAP OF THE CAPP ACTIVITY IN COLUMBIA**


Plans for technical assistance, training and monitoring have been developed and they are to support the implementation of the recommendations set forth in this PERSUAP. These include the lists of cleared and not cleared pesticides, proposals for training programs in SUP and IPM, and a monitoring system. CAPP should implement these recommendations under the guidance of the USAID/Colombia MEO and the supervision of the USAID REA for South America.

*Recommendation No.1: CAPP can influence farmers' pest management practices by guiding growers (1) into thinking about IPM programs ex-ante to crop installation and before resorting to the use of chemical pesticides as the panacea; and (2) in the selection of the least toxic pesticides to humans and the environment.*

*Recommendation No.2: Some of the pesticides being presently recommended and/or listed in the Environmental Reviews by CAPP operators have not been cleared and they should not be used in the program (see Table No.1).*

*Recommendation No.3: No project should be supported without first establishing a crop specific IPM program. CAPP will promote the installation, by project operators, of at least one crop specific IPM demonstration field by region. To do this, CAPP should seek for the appropriate IPM technical offers available in Colombia.*

*Recommendation No.4: In the special case of cotton, a crop with the potential for high consumption of pesticides, and so threatening human and environmental health, CAPP commits technical assistance to (a) help enforce legal ICA regulations, (b) demonstrate and promote crop specific IPM programs, and (c) promote the field use of available bio-pesticides among its operators.*

*Recommendation No. 5: CAPP is encouraged to disseminate, among project farmers, the list of bio-pesticides available in Colombia and facilitate the contacts of the operators with the enterprises producing them, so as to promote their use in replacement of the more toxic and environmentally hazardous chemical pesticides.*

*Recommendation No.6. CAPP will facilitate the provision of Safer Use of Pesticide (SUP) training focused on risk reduction, in the context of IPM, and including the various aspects of pesticide selection, purchase, transport, storage, handling and application. To do this CAPP partners can resort to some of the organizations already offering SUP training in Colombia, such as Agrovida and ANDI-SENA.*

*<u>Recommendation No. 7</u>: CAPP should establish a monitoring program to track IPM and pesticide use and the implementation of the mitigation recommendations (training) put forward in this, and previous, PERSUAPs.*

*<u>Recommendation No.8</u>: CAPP should inform program partner operators about USAID pesticide regulations and socialize the recommendations of this PERSUAP. To this effect it is recommended that CAPP distributes: (1) the list of ex-ante not cleared and prohibited pesticides (attached in Annex No.3); (2) the guidelines for pest management in each crop; and (3) general IPM and SUP guidelines and other documents.*