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FROM THE AMERICAN PEOPLE

Pesticides & USAID's Environmental Procedures

Special 22 CFR 216 Issue: Pesticides

- Pesticides are a commonly encountered element in both agriculture and health activities
- USAID has special procedures within 22 CFR 216 to address pesticide procurement and/or use
- You don't have to avoid using pesticides when they are needed, but you must ensure they are properly selected and safely used





What are pesticides?

Pesticides are biological, chemical or physical agents used to kill unwanted plants, animals, or disease agents.

What about “natural” or “biological” pesticides?

Pesticides derived from natural sources (like **Pyrethrum**) are still pesticides.

What about disinfectants?

The purpose of disinfectants is to kill bacteria or viruses. Disinfectants are also pesticides.

Why Care About Pesticides?



- Poor practice in using pesticides is wide-spread
 - ✓ Overuse accelerates pest resistance which induces increased use
 - ✓ Significant resistance requires switching to less safe and more costly pesticides
- As potent killing agents, pesticides have intrinsic dangers attached to their use
 - ✓ Misuse kills the “good bugs” that are essential to pollination or that naturally control the “bad bugs”
 - ✓ Misuse can result in chronic sickness, birth defects, cancers, and even death
 - ✓ Misuse can seriously impair a country’s ability to export to the U.S., Europe, Japan and other major markets
- The lack of quality control in the production in some developing countries represents a hazard with non-U.S. manufactured pesticides

What Not to Do



Mixing pesticides with bare hands



Pouring pesticide into sprayer without protection

What Not to Do



Bare arms

No Mask

No
Gloves

**Spraying
pesticides with no
protection**

Walking into the
spray mist

No boots



The result . . .



Skin lesions

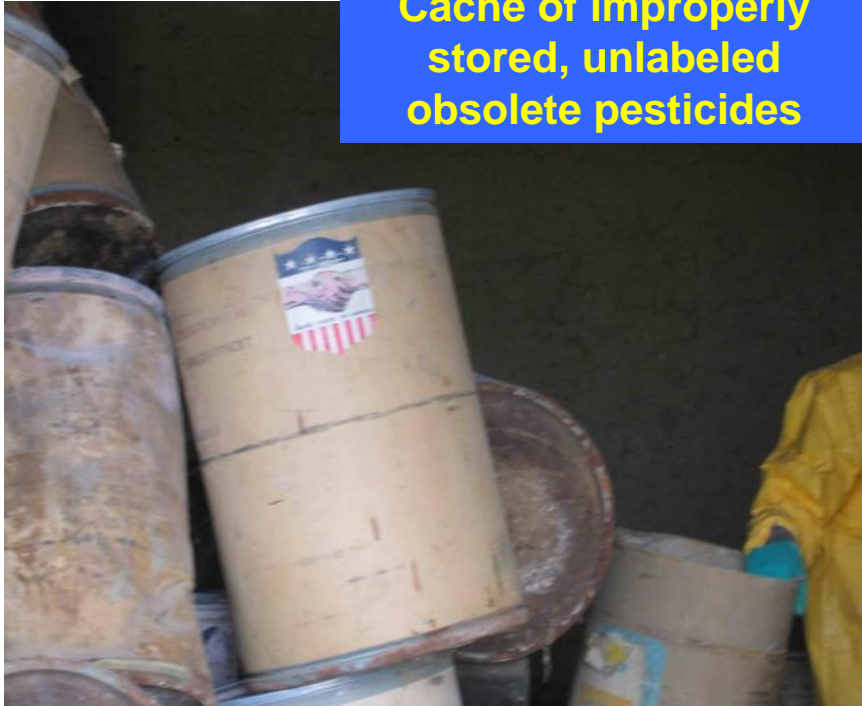


and unfocused vision

- ***With an appropriate EIA, combined with monitoring during implementation, these health problems could have been avoided***

Another Problem – Obsolete Pesticides ...

Cache of improperly stored, unlabeled obsolete pesticides



Damaged barrels leaking into dirt floor

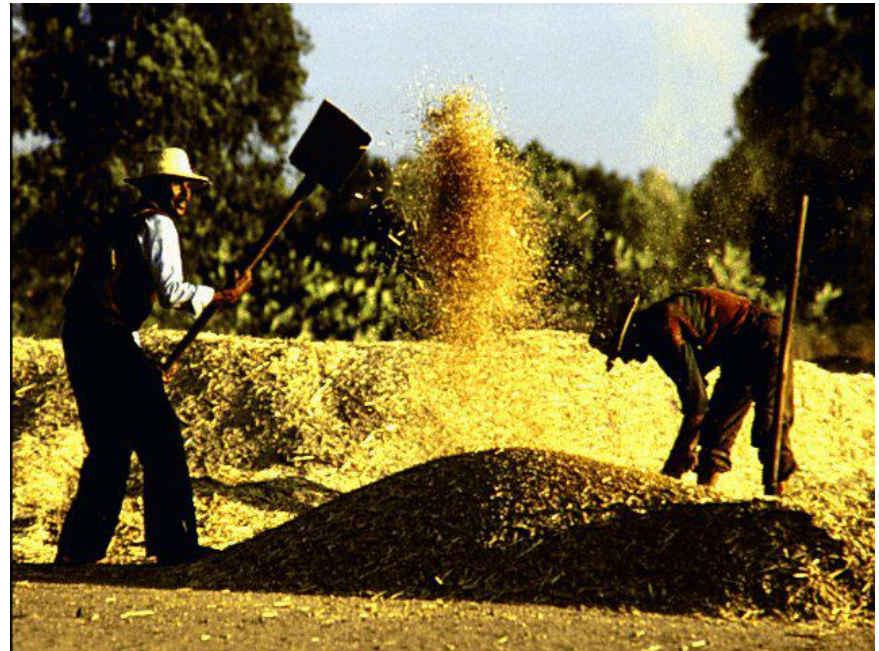


- Proper disposal starts at \$3,000 to \$5,000 per ton, depending on which pesticides are found. Highly toxic ones are much higher.
- Costly site cleanup also needed after the barrels are removed

USAID and Integrated Pest Management (IPM)

IPM aims at controlling pest populations by anticipating pest problems and preventing the damage they cause with minimal chemical use

- Respond to clearly identified pests and their consequences
- Evaluate non-pesticide management options
- Use least toxic, safest pesticides and only as actually needed



It is USAID policy to rely on Integrated Pest Management (IPM) as the framework for every activity (agricultural, health or other) that involves pesticide procurement or use



Pesticide Procedures – 22 CFR 216.3(b)

- Applies to every project that will procure, use, or recommend for use one or more pesticides
- For proposed use or procurement of pesticides the IEE or EA must address the 12 factors outlined in 22 CFR 216.3 (b)(1)(i). This analysis is commonly referred to as a “Pesticide Evaluation Report and Safe Use Action Plan” (PERSUAP).

- ✓ EPA registration status
- ✓ Basis for selection
- ✓ Extent IPM is used
- ✓ Application methods and safety equipment
- ✓ Toxicology and mitigation measures
- ✓ Efficacy
- ✓ Target vs. nontarget species
- ✓ Site’s natural conditions
- ✓ Availability of alternatives
- ✓ Country’s ability to control and regulate pesticides
- ✓ Training for uses
- ✓ Monitoring provisions

What is “pesticide procurement or use”?



Be aware. . .

***USAID interprets
“pesticide procurement
or use” very broadly.***

Specifically. . .

What is “pesticide procurement or use”?

Procurement includes . .

- 1. Direct purchase of pesticides*
- 2. Payment in kind, donations, provision of free samples and other forms of subsidies*
- 3. Provision of credit to borrowers could be procurement*
- 4. Guarantee of credit to banks or other credit providers could be procurement*

Use includes . .

- 1. Sale*
- 2. Handling, transport, storage,*
- 3. Mixing, loading, application*
- 4. Disposal*
- 5. Provision of fuel to transport pesticides*
- 6. Technical assistance in pesticide management*



What is “pesticide procurement or use”?

AND the regulations
also usually apply to. . .



export-oriented projects involving commodities that require pesticides, even if USAID is not using or procuring directly.

*This is a type of **indirect** procurement/use.*



The definition of “procurement or use” does **NOT** include...

- Pesticide used in **evaluation plots** & other research, IF the following requirements are met:
 - Surface area of under 4 ha,
 - Supervised by researchers,
 - Application by trained individuals
 - **The treated products are not consumed by people or animals,**
- Technical assistance for development of host country pesticide regulatory capabilities
- Support for training in safer pesticide use, **not involving actual application or use of pesticides.**

What about EMERGENCY SITUATIONS and other exceptions?

The Pesticide Procedures do not apply to:

- **Projects under emergency conditions.**
- **Projects where USAID is a minor donor.**

However, a decision to provide assistance will be based to the maximum extent possible on the factors normally required in the pesticide section of the IEE.

See 216.3(b)(2).

What are “emergency conditions”?

The USAID Administrator determines in writing that:

***A pest outbreak has occurred or is imminent;
AND***

***Significant health or economic problems will occur without prompt use of the proposed pesticide;
AND***

Insufficient time is available to follow normal procedures.

Useful Web Sites

- www.epa.gov/pesticides/reregistration/status.htm
- www.pmep.cce.cornell.edu/profiles/extoxnet
- www.pesticideinfo.org
- www.epa.gov/pesticides/safety/healthcare/handbook/handbook.htm (English and Spanish versions of pesticide poisoning recognition handbook)

Note: The information in these websites is useful for development professionals but does not substitute for an expert to apply it correctly