

SPECIAL CONSIDERATION FOR PESTICIDES

Jim Hester
Agency
Environmental Coordinator





Why Care About Pesticides?

It's the Law: It is a Federal requirement under Title 22 of the Code of Federal Regulations, Part 216

It's Good Development:

- **As potent killing agents, they have intrinsic dangers attached to their use**
- **The lack of quality control in the production throughout the developing world represents a hazard in non-U.S. manufactured pesticides**
- **Poor use practice is wide-spread**

More Development Issues

- **Overuse accelerates pest resistance which induces increased use, generating a spiral where more and more pesticides are needed to control pests.**
- **Significant resistance requires switching to less safe and more costly pesticides.**
- **Misuse kills the “good bugs” that are essential to pollination or that naturally control the “bad bugs”**



Even More Development Issues

- **Misuse can result in chronic sickness, birth defects, cancers, loss of workdays and even death of farmers, processors and consumers**
- **Misuse can result in refusal of individual export shipments or even long-term cancellation of a country's ability to export to the U.S., Europe, Japan and other major markets**
- **Movement of pesticides off site can poison ecosystems that support people downstream or downwind**





Mixing pesticides with a bare hand



Pouring pesticide into sprayer without protection



Spraying pesticides with no protection



Health worker examining skin lesions



Health worker examining unfocussed vision

Integrated Pest Management (IPM)

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

Strategy in response to clearly identified pests and their consequences:

- A) Evaluate non-pesticide management options
- B) As a LAST resort, if there is no alternative, use pesticides (the least toxic, and limit the time and degree of exposure)



USAID IPM Policy

It is USAID policy to rely on Integrated Pest Management as the framework for every activity that involves pesticide procurement or use.

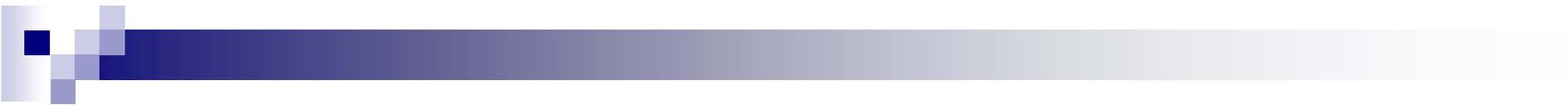


22 CFR 216.3(b)

Pesticide Procedures

- Applies to EVERY project that will EITHER procure OR use one or more pesticides
- For pesticides approved by the U.S. Environmental Protection Agency for same or similar use, the IEE or EA must address the 12 items in this section of 22 CFR 216.



- 
- EPA registration status
 - Basis for selection
 - Extent IPM is used
 - Proposed application methods and safety equipment
 - Toxicology – human and environment and mitigation measures
 - Efficacy
 - Target and nontarget species compatibility
 - Site's natural conditions
 - Availability of alternatives
 - Country's ability to control and regulate pesticides
 - Training for uses
 - Monitoring provisions



More Potentially Risky Pesticide Use

- For projects procuring or using EPA approved, restricted use pesticides – a user hazard evaluation is mandatory
- For projects proposing to use non-EPA approved pesticides, an Environmental Assessment or Environmental Impact Statement is mandatory



Selecting Pesticides and Using them Safely

- If pesticides are to be used, a “Pesticide Evaluation Report and Safe Use Action Plan” (PERSUAP) can be helpful in planning their proposed use.
- The PERSUAP should analyze threats, consequences and safety issues related to pesticide use.
- PERSUAPs can be challenging to implement, and thus partners often seek deferrals before carrying them out.



PER-SUAP

- PER: (Pesticide Evaluation Report)
Reports must be precise and adapted to local realities. US EPA assumptions about the US target population and capacity to enforce guidelines can be different from USAID's, due to developing country situations
- SUAP: (Safe Use Action Plan)
Reflects practical actions which can be taken to reduce the risks generated by pesticide use

Who is Responsible? Everyone!





PERSUAP

Note that:

- If a USAID partner intends to use pesticides through their promotion, purchase or use, it is recommended they hire an expert pesticide advisor for the preparation of both the IEE or EA and the PERSUAP.



REFERENCES

1. *Environmental Guidelines for Development Activities in LAC* and its CD-ROM version

2. Web Sites:

www.epa.gov/pesticides/reregistration/status.htm

www.pnep.cce.cornell.edu/profiles/extoxnet

www.pesticideinfo.org

<http://www.epa.gov/pesticides/safety/healthcare/handbook/handbook.htm> (English and Spanish versions of pesticide poisoning recognition handbook)