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5. Author(s)
1. Peter Bachrach
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OPPORTUNITIES AND RISKS

An Assessment of the Regular 416 Program

March 1988

By

Peter Bachrach

PLANNING ASSISTANCE
1229 15th Street NW
Washington, DC 20005

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EXECUTIVE SUMMARY

Since the reestablishment in 1982 of the foreign donation section of the Agricultural Act of 1949, the "regular" Section 416 program has become an increasingly important source of food assistance. Charged with the dual objectives of reducing surplus food stocks and feeding needy persons overseas, the program has, for the five year period ending September 30, 1987, donated almost 800,000 metric tons of surplus commodities through the auspices of some 70 different cooperating sponsors to 33 different countries.

Seeking to address the issues of past program accomplishments and future program possibilities, AID/W (FVA/PPM) sponsored an evaluation of the regular 416 program. The stated objectives of the evaluation concern virtually all aspects of the program: project design and approval in the field and in Washington, project implementation by the governmental and nongovernmental cooperating sponsors, and project performance and impact. Document study, interviews of participants at various levels, and site visits of existing projects all contributed to an understanding of the program. The Development Assistance Corporation had responsibility for the country studies in Chile, Mexico, Peru, and Tunisia; Planning Assistance had responsibility for the Washington-based desk survey and for the preparation of this final report.

The report contains three chapters which present the results of the 416 program, identify the outstanding issues in the implementation of the program, and discuss recommendations for the improvement of the program.

Overall, the data describe a program with inherent problems but also with solid results in the field. The field studies, though perhaps not entirely representative, illustrate the program's ability to:

- mobilize existing resources and generate additional resources over and above the value of the commodities;

- strengthen local institutions thereby stimulating the initiation, improvement, and expansion of services;

- contribute to the increased productive capacities of the beneficiaries both directly (through income generating

activities, family gardens, etc.) and indirectly (through health related activities, school feeding, etc.)

- have a measurable impact on the nutritional status of certain vulnerable populations.

Inherent program problems stem principally from the difficulties of implementing a constantly evolving legislative mandate. After initial passage in 1982, major changes in the legislation occurred in 1984 and 1985. In addition, modifications of the rules and regulations and changes in available commodities have meant that 416 has never been the same program for two years running. While indefinite resources, flexible and unrestrictive programming, rapid approval, and limited objectives were the operaative assumptions in early 1983, each has become more problematic during the ensuing five years.

- Program objectives became increasingly complex as evidenced by the length of the legislation: initially limited to three sentences in 1982, it increased to two clauses in 1984 and to more than ten clauses in 1985.

- Increasing legislative detail undermined the notions of flexibility and unrestrictiveness on the one hand and rapid approval on the other. The number of issues discussed per project proposal tripled, and approval time more than tripled. Even emergency proposals were not immune from these effects.

- The disappearance of milk and the general instability of commodity availability during the last year or so has created completely new and unfamiliar program circumstances. The full impact of this change will only emerge slowly in the FY 1988 requests.

Program implementation problems stem as well from inter-agency disagreements about the nature of the program, from management issues, and from project design issues.

- Unresolved differences of opinion and interpretation principally between AID and USDA/CCC have impeded the smooth functioning of the program. Fundamental disagreements concerning resource allocation, program emphasis, and program control remain as vigorous in 1987 as they were in 1983.

- Program management problems were more serious in Washington (due in large measure to other program priorities and consequent inadequate staffing) than in the field, and they were related more to the proposal review and approval process than to the implementation of project activities. Recent AID/W efforts have been directed toward the solution of these problems.

- Project design issues have involved the problem of dependency, its definition and its consequences. While 416 has not resolved the problem in its different guises, it has contributed to the development of program elements which attenuate significantly the effects of such dependency.

Recommendations for the improvement of the 416 program are based on two fundamental concerns:

- to identify appropriate program opportunities so as to increase the chances for probject impact and reduce to manageable levels the problem of expectations; and

- to identify potential sources of risk for project implementation so as to increase the appreciation of the roles and responsibilities of the different actors and reduce the sense of vulnerability of all concerned.

Appropriate program opportunities are most likely to be found where

- countries have a tradition (and infrastructure) of helping the needy, clear priorities for target groups, a possibility for mobilizing local resources, and commmited embassy or USAID staff;

- cooperating sponsors have field experience, do not require substantial initial investment, limit their objectives, and work in concert with other cooperating sponsors; and

- project proposals specify the criteria for beneficiary selection and management, preseent flexible ration alternatives, and contain a plan for phase-out or termination.

Potential sources of risk are most likely to be reduced when

- cooperating sponsors are not permitted to alter their normal program emphasis to accommodate 416 commodities and are capable of absorbing commodities on a "windfall" basis;

- project objectives are commensurate with the limitations of the 416 program and project proposals explicitly address the issue of dependency;

- program management introduces some form of fiscal year planning, improves the proposal review and approval procedure, and adopts alternatives to the present system of allocating commodities; and

- information and communication are improved between Washington and the field (on matters of guidance, commodity availability, and program risks) and between the field and Washington (particularly for regular reporting).

Annexes to the report provide an exhaustive description of the 416 program from its inception in 1982/1983 through the end of Fiscal Year 1987.

The purpose of social science research should be to deepen, broaden, and extend the policy-maker's capacity for judgment--not to provide him with answers. Thus, the test of effectiveness will be not in whether the research leads to a new and unfamiliar conclusion but in whether it clarifies and makes explicit the logical basis for a conclusion already perceived or suspected.

--Max Millikan, "Inquiry and Policy"

416 EVALUATION

CHAPTER I: INTRODUCTION

Toward the end of 1986, the Food for Peace Office of AID/Washington began a thorough reexamination of the 416 program including not only the regular 416 program but the sugar quota program as well. In early 1987, a number of organizational changes were introduced within AID/W and others were proposed for consideration by AID's principal partner in the 416 program, the Department of Agriculture.

In this spirit of reassesement and reorganization of the 416 program, FVA/PPM initiated an evaluation concentrating on the regular 416 program. While the internal review emphasized the organizational and operational concerns of the Washington agencies, the external evaluation addressed a broader scope of issues linking the effects of Washington decisions to the field.

REASONS FOR THE EVALUATION

Both the internal review and this external analysis stem from similar concerns involving the importance of the program and its complexity on the one hand, and the results of the 416 program and the expectations raised by it on the other.

Importance

Since the reestablishment in 1982 of the foreign donation section of the Agricultural Act of 1949, the regular 416 program has become an increasingly important source of food assistance. Conceived as a temporary program of limited surplus disposal for humanitarian ends, 416 may more accurately be characterized in 1987 by its permanence, its size, and its multiple objectives. From an analytical perspective, 416 represents a valuable case study of the evolution of a successful public policy idea; from an operational point of view, 416 may offer some important lessons on the difficulties of implementing such policy ideas.

Complexity

If effective implementation relies on continuity (or stability) of the program environment and on accountability for results, then the sources of concern surrounding 416 implementation become immediately apparent. Firstly, the program has been in an almost constant state of change since 1982, with major changes in the legislation occurring in 1984 and 1985. In

between, when the wording of the legislation was not changing, the implementing rules and regulations were, and when the interpretive regulations were relatively stable, the commodities were changing. In a very real sense, 416 has never been the same program for two years in a row. Secondly, there has been an array of agency linkages including the relationship between USDA and AID/W, the role of the DCC, and the rights and responsibilities of the USAID missions (or embassy representatives) and the cooperating sponsors. This multiplicity of actors, all with both individual and collective responsibilities and all joined in various combinations and permutations at different points in time, has resulted in a complex sharing of tasks and a diffusion of responsibilities.

Results

The initial objectives of the 416 program were twofold: to reduce surplus stocks and to feed the needy overseas. While seemingly compatible, each objective has been a source of major concern for the implementing agencies and in particular for AID/W. Clearly, 416 has contributed to the reduction of certain surplus stocks, but the ensuing volatility of available commodities has significant consequences for the future of the program. Based on the field studies by DAC, 416 has also played a significant role in assisting the needy; unfortunately, no data are reported to AID/W on a regular basis thus leaving in doubt the effectiveness of the assistance.

Expectations

Expectations about the 416 program have created a situation of enormous vulnerability for the donor, the cooperating sponsor, and most especially for the recipient beneficiary. To a certain extent, the apparent characteristics which make 416 so appealing conceal contradictions which have never really been resolved: how temporary is temporary, how certain are surpluses, and so forth. What is clear is the centrality of AID/W in the chain of expectations. On the one hand, commodity availability announced by USDA transits AID/W very often creating enormous problems for USAIDs or embassies faced with cooperating sponsor demands. Conversely, the incomplete and irregular arrival of data from the field transit AID/W and become a major source of embarrassment given the reporting requirements of AID/W and USDA with respect to Congress.

ORGANIZATION OF THE EVALUATION

Seeking to address these concerns, an evaluation was jointly undertaken between June and October 1987 by Planning Assistance and the Development Assistance Corporation. Planning Assistance

had responsibility for the Washington-based desk survey and for the preparation of this final report; the Development Assistance Corporation had responsibility for the country studies in Chile, Mexico, Peru, and Tunisia.

The stated objectives of the evaluation concern virtually all aspects of the 416 program: project design and approval in the field and in Washington, project implementation by the governmental and nongovernmental cooperating sponsors, and project performance and impact. The evaluation therefore requires a number of perspectives, looking backwards and forwards, from Washington and from the field, and from food aid policy makers to food aid program implementors.

Both the data collection phase and the report preparation phase of the evaluation have sought to identify different perspectives and present alternative points of view. Document study, interviews of participants at various levels, and site visits of existing projects all contributed to the appreciation of a program which can only be understood as an amalgam of these different perspectives.

ORGANIZATION OF THE REPORT

The report contains three chapters which present the results of the 416 program, identify the outstanding issues in the implementation of the program, and discuss recommendations for the improvement of the program.

The presentation of the results of the 416 program is organized around three basic questions: what happened, was what happened consistent with the legislative intent, and did what happened have the desired effects in the field. Three different interpretations of what happened will be examined and reconciled in order to provide a descriptive context for the consideration of two additional aspects of the program. Then, the evaluation will compare these descriptive results with the objectives of the legislation in order to see the impact of the legislation on program implementation. Finally, the evaluation will examine the impact of 416 on the populations it was legislatively mandated to assist.

The identification of the issues is organized according to whether they are the result of certain historical circumstances influencing the implementation of the program, or whether they are the product of certain existing systems and decision-making procedures, or finally whether they are the consequence of the interrelationship of different program elements.

Discussion of the recommendations is organized around needs for clearer policy, increased guidance, and improved implementation.

CHAPTER II: RESULTS OF THE 416 PROGRAM

Three sources of documentation exist for examining the results of the regular 416 program. The first source comprises the implementing authority and includes the legislation, the rules and regulations, and the various agreements linking the implementing agencies. Together, these various documents represent the implementing agencies' understanding of Congressional intent. The second source includes all of the signed program agreements and represent the implementing agencies' attempt to respect the intentions of the legislation. The third source are reports from the field concerning the use of the food and represent the cooperating sponsors' best efforts to honor their contractual obligations.

Of these different sources, the agreements offer the best starting point for a consideration of the results of the program because they are the most complete source and because they represent the best link between what was happening in Washington and what was supposed to happen in the field. This chapter begins with an analysis of data collected systematically from the 130 agreements signed between January 1, 1983 and September 30, 1987.

Comparison of these results with what the legislation intended presents certain difficulties because of the changing nature of the legislation and because the legislation is more explicit about how the program should be implemented than about what it should accomplish. There were early on, however, certain prevailing notions of the special nature of the program, and this chapter will compare what happened with these impressions.

The third source is by far the least complete, and the analysis will necessarily be more summary. An attempt will be made to categorize the different types of 416 interventions and to indicate the kinds of impacts which have occurred.

In sum, this chapter is organized around three basic questions concerning the results of the 416 program: what happened, was what happened consistent with the legislative intent, and did what happened have the desired results in the field?

WHAT HAPPENED?

Stated in the most summary fashion possible, the regular 416 program has since 1983 donated almost 800,000 metric tons of surplus commodities through the auspices of some 70 different

cooperating sponsors to 33 different countries. In order to assess in more detail these results, it is necessary to choose different units of measure and to establish several working hypotheses.

Since, as the summary statement above indicates, the program donates commodities through the cooperating sponsors to different countries, there would seem to be three units to consider:

- commodities, and in particular the kinds and amounts;
- cooperating sponsors, and in particular the distribution of agreements between governmental and nongovernmental organizations; and
- countries, and in particular the geographical distribution and the level of development of the countries.

As working hypotheses for the evolution of the program, this section will consider three alternative interpretations:

- that 416 is a program which has grown rapidly and in potentially worrisome directions;
- that 416 is a program which by its very nature exhibits a certain variability;
- that 416, despite the vagaries of legislative change and commodity availability, has remained remarkably consistent since its reestablishment.

The chart on the following page summarizes the indicators used to support the differernt working hypotheses. In the discussion which follows, these indicators will be examined in more detail, and an attempt will be made to integrate all of the findings into an overall context for evaluating the program.

Growth

Arguments for the interpretation that 416 is growing rapidly and in worrisome directions focus primarily on the amounts of commodities handled under the program. An analysis of both the amount of growth and the sources of growth are thus necessary to understand this argument.

The amount of growth can be expressed in three complementary ways: total tonnage, average size of the agreement, and average size of the country programs (the sum of all agreements in a given country). The table below summarizes these results for each of the indicators.

TABLE 2. Growth of the 416 program (in metric tons)

	1983	1984	1985	1986	1987
Total tonnage	61,792	119,742	193,334	153,974	269,420
Average agreement	3,090	3,991	4,345	4,851	13,515
Average country	4,414	7,484	10,175	9,057	16,839

TABLE 1. Summary of Indicators by working hypothesis

	Commodities	Agreements	Countries
Growth	Total tonnage Increase in grains	Average tonnage of agreement Average agreement tonnage of small PVOs	Average tonnage of country Mexico as a % of total 416 tonnage
Variability	Total tonnages of - NFDM - cheese - butter oil - butter	Number of agreements	Number of countries with agreements Percentage of countries outside LAC countries
Consistency	Percentage of total tonnage to repeating programs	Percentage of agreements with repeating cooperating sponsors	Concentration of assistance in relatively few countries Concentration of assistance in LAC and ADC countries

These summary data suggest a program characterized by important growth during the first three years, retrenchment during the fourth year, and dramatic change in the fifth year.

Behind these summary results are three trends which may be more interesting than the overall size of the program. First, and chronologically the most recent, has been the trend away from dairy products to grains. From 1983 through 1985, no grains were committed; in fiscal 1986, grains represented some 27,000 metric tons. In fiscal 1987, grains increased almost seven times to a total of almost 190,000 metric tons.

A second trend, and at least as important as the shift in commodities in its implications, is the growth of the Mexico program. The chart below indicates the amount and the percentage of all food committed to Mexico.

TABLE 3. Growth of the Mexico 416 program

	1983	1984	1985	1986	1987
Total tonnage	21,013	15,765	45,542	52,075	128,596
% of total 416	34	13	24	34	48

As the table indicates, since FY 1984, the Mexico program as a proportion of total 416 aid has been growing steadily and significantly. Mexico's program in FY 1987 constitutes almost half of the entire 416 program.

A third trend is the rise of what might be called the small or nontraditional food aid PVO. Since 1983, the number of smaller PVO's participating in the program has increased each year, and the average size of their programs has increased from 122 metric tons in 1983 to 6,119 in 1987. The proportion of total 416 food being distributed by these smaller PVO's and their affiliates has increased from 1% to 30%. Finally, for FY 1987, these PVO's handled almost as much food as the traditional food aid PVO's (80 thousand tons as compared to 92 thousand tons).

In terms of these indicators, the trends during the first five years of the program suggest the need for reflection on the directions of the program. In the span of a single year, the program has increased by more than 100,000 metric tons and the distribution of dairy and grains has been reversed, from 80/20 to 30/70. In the span of three years, a single country has come to dominate the program. And in the span of five years, the proportion of food to less well-known PVO's has increased thirty times.

Variability

Arguments for the interpretation that 416 may be inherently changeable rest primarily on indicators of supply and demand as

reflected in the program agreements. These indicators may be categorized according to whether they exhibit regular or irregular tendencies, that is, whether or not they may be cyclical in nature.

While the program is still too young to confirm these types of tendencies, indicators of demand for and supply of 416 commodities exhibit a surprising regularity. The following table presents indicators of approved demand in the form of signed agreements.

TABLE 4. Indicators of demand for 416 commodities

	1983	1984	1985	1986	1987
Number of countries	14	16	19	17	15
Number of agreements in effect	20	30	45	32	26
% of agreements outside LAC countries	25	40	51	37	31

All of these indicators reflect the impact of the African drought of 1985 and may represent the beginnings of cyclical demand for 416 commodities.

Another set of indicators of supply of 416 commodities as reflected in the signed agreements is presented below.

TABLE 5. Indicators of supply of 416 commodities

	1983	1984	1985	1986	1987
Tons of NFDM	50,190	67,579	137,472	84,287	48,519
Tons of cheese	3,526	7,089	28,280	19,406	16,011
Tons of butter oil	7,476	11,265	23,040	18,611	8,919
Tons of butter	600	33,809	3,724	1,882	3,175

Of these commodities, only butter demonstrates a marked irregularity. Whether or when supplies of dairy products will begin the next cycle is unclear, but large surpluses like drought and crop failure do tend to come in cycles.

Two observations may be made on the basis of Tables 4 and 5. First, while it is clear that the 416 program has certain inherent variations, these may occur over a longer time frame than has been supposed. Second, excluding grains, the 416 program for FY 1987 looks far more like the 416 program for FY 1983 than for any other fiscal year.

Consistency

The argument for consistency emphasizes countries in the first instance and is based on two major characteristics of the 416 program, its concentration in a limited number of countries

and its duration or relative permanence in those countries. First, as a measure of 416's concentration, in the five years of 416 program history, the five most important recipient countries have always accounted for at least 70% of all commodities, as the following table indicates.

TABLE 6. Geographic concentration of 416 commodities

1983		1984		1985		1986		1987	
Mexico	34%	Poland	41%	Mexico	24%	Mexico	34%	Mexico	48%
Peru	31	Brazil	17	Brazil	16	Ethiopia	17	Tunisia	21
Chile	12	Mexico	13	Poland	13	Poland	7	Ecuador	11
Guatemala	8	Chile	8	Ethiopia	12	Chile	7	Chile	8
Indonesia	5	Mozmbqe	5	Chile	11	Brazil	7	Mozmbqe	5

Of these countries, Mexico and Chile appear each year among the top five; Brazil and Poland for three of the five years. Together, these four countries have been the recipients of more than 60% of all 416 commodities.

This concentration in four countries influences other results. Thus, three of the four countries are Latin American, and another area of consistency in program implementation has been the geographic distribution of 416 commodities. Further, all four of the countries may be considered advanced developing countries and overall, more than 70% of all 416 commodities have been distributed in advanced developing countries.

Second, as a measure of 416's duration or relative permanence in a limited number of countries, it should be noted that 13 have received food during at least three fiscal years and seven in at least four or five fiscal years. Within these countries there exists another source of consistency, the cooperating sponsors and the number of programs which are repeat programs, that is, the same cooperating sponsor engaging in the same activities with respect to the same target population. Of the 130 agreements signed since the reintroduction of the 416 program in 1982, 89 (or 68%) have been with cooperating sponsors who have had repeat agreements.

Reconciliation of the Interpretations

As the preceeding sections suggest, reasonably strong cases can be made for three different interpretations of the evolution of the 416 program. In fact, by grouping the countries having received 416 commodities according to certain characteristics, a means exists for demonstrating the complementarity of the different interpretations. The table on the next page categorizes countries according to the duration of their 416 assistance and according to the total amount of commodities received.

TABLE 7. Categorization of countries by commodity amounts and program duration

	Less than 3 FY	4 or 5 FY
	Group I	Group II
Less than 15,000 MT	Angola	Haiti
	Bolivia	Philippines
	Burkina Faso	Tanzania
	Chad	
	Colombia	
	Costa Rica	
	Dominican Republic	
	Guatemala	
	Guinea	
	India	
	Indonesia	
	Jamaica	
	Lebanon	
	Niger	
	Pakistan	
	Panama	
	Portugal	
	Sri Lanka	
	Sudan	
	West Indies	
	Group III	Group IV
More than 15,000 MT	Ecuador	Brazil
	Ethiopia	Chile
	Mauritania	Mexico
	Mozambique	Peru
	Tunisia	Poland

The table below presents the results of Table 7 comparing for each cell the proportion of the countries and the proportion of the commodities.

TABLE 8. Comparison of countries and commodities

	Group I	Group II	Group III	Group IV
% of countries	60.6%	15.2%	9.1%	15.2%
% of commodities	9.7	23.6	1.6	65.1

This table suggests that there are really three situations present in the 416 program.

The first situation is represented by the Group IV countries; these are the giant repeater programs which account for almost two-thirds of all commodities and which account for the consistency and concentration of the program.

The second situation is represented by the Group I countries which comprise the majority of the recipient countries but less than ten percent of the total commodities. This group of countries contributes to the variability of the 416 program, particularly as measured by countries and signed agreements.

The third situation is represented by the Group II and III countries and exhibit the somewhat contradictory characteristics of being either short-term and large or long-term and small. Of these two groups, Group III is the more interesting since it is a source of major growth of the 416 program. The table below compares the proportion of total tonnage of these two groups with Groups I and IV.

TABLE 9. Evolution of the proportion of total tonnage among country groups

	1983	1984	1985	1986	1987
1st situation	81%	80%	63%	61%	59%
2nd situation	19	11	15	11	3
3rd situation	0	9	22	28	38

Looked at from this perspective, two trends seem important. First, the growth of the Mexico program has been offset by the termination of the Brazil and Poland programs thus yielding a certain consistency among the large 416 program participants. Second, and perhaps more important, the data indicate a shift away from a broad range of smaller programs to the introduction (at the rate of one or two a year) of very large 416 assistance programs.

In sum, the question of what has happened during the five years of 416 implementation is not simply and easily answered. Because, as will be seen in the next section, the program has

necessarily defined itself as it has gone along, understanding what happened requires a great deal of retrospective analysis. This retrospective analysis suggests that some of the prevailing perceptions of 416, and particularly that it is a program out of control, need correction. The analysis also suggests three quite different programming strategies corresponding to the situations outlined above. Which of these situations best conforms to the intent of the legislation will be considered below.

WAS WHAT HAPPENED CONSISTENT WITH THE LEGISLATIVE INTENT?

Authority to provide foreign donations under Section 416 was reinstated by enactment of the Omnibus Budget Reconciliation Act of 1982. Language in this legislation is limited to three sentences which establish the objectives, identify the coordinating mechanism for implementation, and fix the responsibility for resolving the logistical problems associated with the donation.

The key characteristic of the program was its linkage to the disposal of residual surplus commodities since the program's logical basis followed from the indefinite nature of its resources. If the program relied upon an immediately available resource for which no future commitment could be made, then programming had to be as flexible and unrestrictive as possible in order to take advantage of virtually any program opportunity. If programming was to succeed in placing the maximum amount of commodities in the minimum amount of time, then proposal review and approval had to rapid. If approval was to be rapid, then proposals had to be limited in their objectives and simple.

Indefinite resources, flexible and unrestrictive programming, rapid approval, and limited objectives--these were the operative assumptions of the implementation of the 416 program in early 1983. During the ensuing five years, each assumption became more and more problematic. First, objectives became more complicated. As a result of this change and changes in the legislation, programming became less flexible and unrestrictive. Proposal review and approval time increased. And finally the resources really became indefinite with the important reduction in the amount of available dairy commodities. This section will seek to detail these changes.

Limited Objectives

Unlike P.L. 480, Section 416 was not encumbered with multiple objectives ranging from expanding export markets for American agricultural commodities to promoting U.S. foreign policy. Early internal discussions in Washington stressed the need to distinguish between P.L. 480 with its well-defined priorities and its emphasis on development activities and Section 416 which required only that commodity disposition be consistent with other food resource assistance programs.

While the relative advantages of the two sources of assistance have remained sufficiently distinct over time, objectives have become rather similar. From the beginning, the 416 program embraced objectives that were broader than humanitarian assistance. By 1984, developmental purposes were well-established if not as priority objectives at least as preferred objectives. With the passage of the 1985 farm bill, Section 416 programs explicitly became subject to disincentive and usual marketing (UMR) analyses, thus expanding the scope of 416 objectives to include export considerations. Finally, and inevitably, the 416 program has become bound up with the pursuit of U.S. foreign policy.

The quickest measure of the addition of objectives is the length of the legislation governing the 416 program. Initially limited to three sentences in 1982, it increased to two clauses in 1984 and to more than ten clauses in 1985. A more detailed analysis is presented on the following pages. Changes are categorized according to three different types of issues addressed by the legislation:

- technical or programmatic issues involving the intended purposes of the program;
- economic issues concerning the effects of donations on the local economy;
- administrative issues concerning the organizational and logistical consequences of the first two types of issues.

Table 10 demonstrates the increasing complexity of the program associated with its evolving objectives. While the overall thrust of the program may not have changed between 1982 and 1985, the accumulation of detail with respect to the achievement of its objectives made for a vastly more complicated program than the original legislation seemed to have intended.

Flexible and Unrestrictive Programming

The principal effect of the increasing detail contained in the legislation was to undermine the notions of flexibility and unrestrictiveness. That is, the additional language provided the opportunity and justification for expanded analysis of the different 416 proposals if the program implementors so chose.

To determine whether this occurred, a detailed investigation of the files of the different projects was undertaken and sought to identify as many of the issues discussed as possible. The results are limited by a reliance on the written record and by a paucity of files for some of the early projects. Table 11 which follows presents data on the proportion of projects for which issue data was collected and on the average number of issues discussed.

TABLE 10: Description of changes in the 416 legislation

1982	1984	1985
TECHNICAL ISSUES		
Prevent the waste of commodities Assistance of needy persons		
The Commodity Credit Corporation is authorized on such terms and under such regulations as the Secretary of Agriculture may deem in the public interest, to make commodities available	Commodities acquired by the Commodities Credit Corporation which the Secretary determines meet the criteria specified may be furnished by the Secretary for carrying out Title II of P.L. 480 as approved by the Secretary and for such purposes as approved by the Secretary.	The Secretary may furnish eligible commodities for carrying out programs of assistance in developing countries and friendly countries. No commodities may be acquired for the purpose of their use under this subsection.
	Dairy products and wheat may not be made available for disposition in amounts that will, in any way reduce the amounts of commodities that traditionally are made available through donations to domestic feeding programs or agencies.	Commodities may not be made available for disposition under this subsection in amounts that (i) will, in any way, reduce the amounts of commidities that traditionally are made available through donations to domestic feeding programs or agencies or (ii) ... (PIK) ...
Dairy products	Dairy products and wheat UHT milk	Eligible commodities include dairy products, grains, oilseeds, and such other edible agricultural commodities as may be acquired by the Secretary or the Commodity Credit Corporation
The Secretary may from time to time estimate and announce the quantity of such commodities which he anticipates will become available for distribution.		(10) (A) Subject to the limitations established under paragraph (3), the Secretary shall make available for disposition under this subsection in each of the fiscal years 1986 through 1990 not less than the minimum quantities of eligible commodities specified in subparagraph (B). (B) The minimum quantity of eligible commodities that shall be made available for disposition under this subsection in each fiscal year shall be-- (i) 500,000 metric tons of grains and oilseeds from the Corporation's uncommitted stocks of grains and oilseeds as of the end of such fiscal year (as estimated by the Secretary), whichever is less; and (ii) 10 percent of the Corporation's uncommitted stocks of dairy products, but not less than 150,000 metric tons of such products to the extent that uncommitted stocks are available. The Secretary shall make such estimation of expected year-end levels of the Corporation's

		uncommitted stocks prior to the beginning of of the fiscal year. The Secretary's determination as to the amount of the Corporation's stocks that shall be made available for disposition under this subsection for such fiscal year shall be published in the Federal Register, along with a breakdown by kind of commodity and the quantity of each kind of commodity that shall be made available, before the beginning of such fiscal year. (C) Of the aggregate amounts made available each fiscal year pursuant to both clauses (i) and (ii) of subparagraph (B), not less than 75,000 metric tons shall be made available to carry out the Food for Progress Act of 1985. (D)(i) The Secretary (I) may waive the minimum quantity requirements of subparagraphs (A) and (B) for a fiscal year to the extent that the Secretary determines and reports to Congress that there are not sufficient requests for eligible commodities under this subsection for such fiscal year, except that the waiver authority of this subclause may not be used to waive the minimum quantity requirement of subparagraph (C); (II) may waive the minimum quantity requirement of subsection (C) in accordance with subsection (f)(2) of the Food for Progress Act of 1985; and (III) may waive the minimum quantity requirements of subparagraphs (A), (B), and (C) for a fiscal year, if the Secretary determines that the restrictions on the furnishing of commodities under paragraph (3) prevent the making available of commodities in such quanties. (ii) For any fiscal year in which the minimum levels of uncommitted Commodity Credit Corporation stocks specified in subparagraph (B) are not made available and during which any requests for commodities under this subsection are rejected, the Secretary shall provide a detailed, written explanation to Congress, at the end of such fiscal year, of the reasons for the rejections of such requests.
Donations to be made through foreign governments and public and nonprofit private humanitarian organizations.		
	Agreements may be entered into under this subsection to provide dairy products and wheat in installments over an extended period of time.	(4) Agreements may be entered into under this subsection to provide eligible commodities in installments over an extended period of time.

ECONOMIC AND FINANCIAL ISSUES

The Secretary shall obtain such assurance as he deems necessary that the recipients will not diminish their normal expenditures for food.		(B) (i) The requirements of section 401(b) of the Agricultural Trade Development and Assistance Act of 1954 shall apply with respect to commodities furnished under this subsection. Commodities may not be furnished for disposition to any country under this subsection except on determinations by the Secretary that-- (I) the receiving country has the absorptive capacity to use the commodities efficiently and effectively; and (II) such disposition of the commodities will not interfere with usual marketings of the U.S., nor disrupt world prices of agricultural commodities and normal patterns of commercial trade with developing countries. (ii) The requirement for safeguarding usual marketings of the U.S. shall not be used to prevent the furnishing under this subsection of any eligible commodity for use in countries that-- (I) have not traditionally purchased the commodity from the U.S.; or (II) do not have adequate financial resources to acquire the commodity from the U.S. through commercial sources or through concessional sales arrangements. (C) The Secretary shall take reasonable precautions to ensure that-- (i) commodities furnished under this subsection will not displace or interfere with sales that otherwise might be made; and (ii) sales or barter under paragraph (7) will not unduly disrupt world prices of agricultural commodities nor normal patterns of commercial trade with friendly countries.

ADMINISTRATIVE AND LOGISTICAL ISSUES

Donations shall be coordinated through the mechanism designated by the President to coordinate assistance under P.L. 480.		Assistance shall be coordinated through the mechanism designated by the President to coordinate assistance under P.L. 480.
	To the maximum extent practicable, expedited procedures shall be used in implementing the provisions of this subsection.	(8) (A) To the maximum extent practicable, expedited procedures shall be used in the implementation of this subsection.
	The provisions of section 203 of P.L. 480 shall apply to commodities furnished under this subsection.	(5) (A) Section 203 of the Agricultural Trade Development and Assistance Act of 1954 shall apply to the commodities furnished under this subsection.

Donations shall be in addition to the level of assistance programmed under P.L. 480.	The cost of commodities furnished and the expenses incurred shall be in addition to the level of assistance programmed under that Act	(6) The cost of commodities furnished under this subsection, and expenses incurred under section 203 of the Agricultural Trade Development and Assistance Act of 1954 in connection with those commodities, shall be in addition to the level of assistance programmed under that Act and shall not be considered expenditures for international affairs and finance.
The Commodity Credit Corporation may pay, with respect to commodities so donated, reprocessing, packaging, transporting, handling, and other charges, including the cost of overseas delivery		(B) The Commodity Credit Corporation may pay the processing and domestic handling costs incurred, as authorized under this subsection, in the form of eligible commodities, as defined in paragraph (2)(A), if the Secretary determines that such in-kind payment will not disrupt domestic markets.
	Commodities may be sold or bartered, as approved by the Secretary, solely as follows: -they are incidental to the donation; -the proceeds of which are used to finance the distribution, handling, and processing costs of the donated commodities in the importing country or other activities in the importing country that are consistent with providing food assistance to needy people; -the proceeds of which are consistent with normal programming procedures in the distribution of commodities by those intergovernmental organizations.	(7) Eligible commodities, and products thereof, furnished under this subsection may be sold or bartered only with the approval of the Secretary and solely as follows: (A) Sales and barter that are incidental to the donation of the commodities or products. (B) Sales and barter to finance the distribution, handling, and processing costs of the donated commodities or products in the importing country that are consistent with providing food assistance to needy people (C) Sales and barter of commodities and products furnished to intergovernmental agencies or organizations, insofar as they are consistent with normal programming procedures in the distribution of commodities by those agencies or organizations. (D)(i) Sales of commodities and products furnished to non-profit and voluntary agencies or cooperatives for food assistance under agreements that provide for the use, by the agency or cooperative, of foreign currency proceeds generated from such sale of commodities or products for the purposes established clause (ii) of this subparagraph. (ii) Foreign currency proceeds generated from the sales of commodities and products under this subparagraph shall be used by non-profit and voluntary agencies or cooperatives for activities carried out by the agency or cooperative that will enhance the effectiveness of transportation, distribution, and use of commodities and products donated under this subsection, including food for work programs and cooperative and agricultural projects. (iii) Except as otherwise provided in

	clause (v), such agreements, taken together for each fiscal year, shall provide for sales of commodities and products for foreign currency proceeds in amounts that are, in the aggregate, not less than 5 percent of the aggregate value of all commodities and products furnished for carrying out programs of assistance under this subsection in such fiscal year. The minimum allocation requirements of this clause apply with respect to commodities and products made available under this subsection for carrying out programs of assistance under title II of the Agricultural Trade Development and Assistance Act of 1954, and not with respect to commodities and products made available to carry out the Food for Progress Act of 1985. (iv) Foreign currency proceeds generated from the sale of commodities or products under this subparagraph shall be expended within the country of origin within one year of acquisition of such currency, except that the Secretary may permit the use of such proceeds (I) in countries other than the country as necessary to expedite the transportation of commodities and products furnished under this subsection, and (II) after one year of acquisition as appropriate to achieve the purposes of clause (i). (v) The provisions of clause (iii) of this subparagraph establishing minimum annual allocations for sales and use of proceeds shall not apply to the extent that there have not been sufficient requests for such sales and use of proceeds nor to the extent required under paragraph (3). (E) Sales and barter to cover expenses incurred under paragraph (5)(a).
	(B) The Secretary shall be responsible for regulations governing sales and barter, and the use of foreign currency proceeds, under paragraph (7) of this subsection that will provide reasonable safeguards to prevent the occurrence of abuses in the conduct of activities provided for in paragraph (7).
Except as provided, no portion of the proceeds or services realized from sales or barter may be used to meet operating and overhead expenses	No portion of the proceeds or services realized from sales or barter under this paragraph may be used to meet operating and overhead expenses, except as otherwise provided in subparagraph (C) and except for personnel and and administrative costs incurred by local cooperatives.

Upon completion of the pilot UMT program the Secretary shall submit a report to Congress on its operation	
	(9)(A) Each recipient of commodities and products approved for sale or barter under paragraph (7) shall report to the Secretary information with respect to the items required to be included in the Secretary's report pursuant to clauses (i) through (iv) of subparagraph (B). Reports pursuant to this subparagraph shall be submitted in accordance with regulations of the Secretary. Such regulations shall require at least one report annually, to be submitted not later than December 31 following the end of the fiscal year in which the commodities and products are received; except that a report shall not be required with respect to fiscal year 1985. (B) Not later than February 15, 1987, and annually thereafter, the Secretary shall report to the Congress on sales and barter, and use of foreign currency proceeds, under paragraph (7) during the preceding fiscal year.

TABLE 11. Changes in the number of issues discussed

	1983	1984	1985	1986	1987
% of projects with issue data	55%	35%	39%	42%	63%
Average number of issues discussed	3.5	4.5	5.5	8.0	10.0

Because of the incompleteness of the data, the conclusions must be somewhat limited, but the tendency certainly seems to be in the direction of more and more discussion of the proposals.

Two questions immediately arise concerning the types of issues discussed and the extent to which discussion of them materially improved the proposal. As to the former question, the table on the next page indicates by year the type of issue raised and the number of times it was raised. In terms of technical or programmatic issues, two have been of concern since the inception of the program. These involve the commodities (availability, mix, quantity, and presentation) on the one hand, and the complementarity of their use with other programs on the other. Two other issues are of more recent concern. One is fundamental and goes to the question of the long-term effects of the proposed assistance; the other is a generally vaguely phrased request for additional information on the plan of operations. In terms of the economic issues, Table 12 shows that disincentive and sales issues have remained relatively constant over time, regardless of the legislation in effect. Finally, there has been a dramatic increase in the number of administrative, organizational, and logistical issues which are directly attributable to changes in the legislation concerning Bellmon and monetization.

As to the latter question of whether the discussion of the different issues materially improved the proposal, the response must clearly be limited to an informed guess. As an indication, however, an analysis was done of approximately 30 proposals submitted more than once. Presumably, over time, either the content of the proposals should change or the number of issues raised should decrease. Since in these instances the proposals submitted annually remained virtually identical from year to year, the number of issues discussed should decrease. The table below presents the results of this analysis.

TABLE 13. Issues raised on identical proposals submitted more than once

	1984	1985	1986	1987
All proposals	4.5	5.5	8.0	10.0
2nd time proposals	1.8	8.8	10.5	5.0
3rd time proposals	-	2.3	7.0	4.5
4th time proposals	-	-	3.0	6.0

TABLE 12. Type and frequency of issues discussed

	1983	1984	1985	1986	1987
Technical/Programmatic					
-Commodities	4	7	11	11	22
-Beneficiaries	2	1	3	4	4
-Cooperating sponsors	3	2	3	2	0
-Program complementarity	4	2	2	4	13
-Dependency	0	0	6	3	6
-Detailed plans of operation	0	3	1	2	7
Economic					
-Donations/sales/UMR	6	5	10	7	8
Administrative, organizational and logistical					
-Proposal review	2	3	6	5	4
-Payment of transport costs	3	3	11	2	7
-Facilities, storage, and distribution (Bellmon)	1	1	7	5	21
-Shipping requirements	1	0	0	1	4
-Contributions/use of monies	4	3	11	5	17
-Management (accounting, staffing, monitoring)	2	2	6	5	13
-Reporting	0	2	5	0	1

In essence, this table suggests that an acceptable program proposal in one year does not guarantee easier acceptability in succeeding years, even if the proposal does not change.

Stated somewhat differently, these various tables indicate that if the notion of flexible and unrestrictive programming ever existed, it existed for a relatively short period of time.

Rapid Approval

The fact that additional issues were being raised with respect to the different 416 proposals does not necessarily preclude rapid approval, assuming that the proposal review and approval process is well organized. In fact, approval time, defined as the time from the date of the initial submission to the date of the final signature, has increased every year since the reestablishment of the program. The table below presents data on the proportion of projects for which time of approval data was collected and on the average duration of the approval process.

TABLE 14. Approval times for 416 proposals

	1983	1984	1985	1986	1987
% of projects with approval data	70%	57%	55%	74%	88%
Average duration of of approval (months)	2.5	4.8	5.0	5.5	8.3

Additional analysis indicates that these approval periods vary only slightly with respect to the size of the program. Average approval times for projects of less than 1,000 tons have been the same as for projects of 1-5,000 tons (roughly four and a half months), and slightly less than projects of 5,000 tons or more (about six and a half months).

These data chart results for all projects, but it is also necessary to single out the important case of emergency projects, since rapid approval is even more critical in these instances. The table below presents these results.

TABLE 15. Approval times for emergency 416 proposals

	1983	1984	1985	1986	1987
Number of emergency projects	2	4	18	9	3
% of projects with approval data	100%	75%	28%	56%	100%
Average duration of approval (months)	2.4	5.1	2.7	4.7	5.4

Overall, the average time for approval of an emergency 416

proposal was four months. Unfortunately, much data from the African drought countries was unavailable, but based on existing data, African proposals averaged three months for approval while proposals from other regions averaged five. Emergency proposals were by and large processed more rapidly than non-emergency proposals, but not significantly enough to be considered truly responsive.

Indefinite Resources

While the increasing complexity of the legislation probably accounts for the longer approval times of 1984-1986 noted in Table 14, uncertainty with respect to the availability of dairy commodities, and particularly milk, are at the root of the additional delays noted for 1987. Of fifteen proposals received in Washington before September 30, 1986, nine were approved before the end of November 1986 in an average time of 6 months. Of the remaining six, none were approved before the end of March 1987 and the average time of approval was 9 months.

In short, for a period of about four months, the 416 program ground to a halt. When it recommenced during the third quarter of FY 1987, it was a completely different program than it had been before. For the nine proposals mentioned above, commodities approved included 21.1% grains; the remaining six included 76.3% grains. This started a trend which continued through the rest of the FY 1987 program, since the remaining ten projects approved between April and the end of September 1987 also included an average of 76,1% grains.

What had been for years a dairy commodities program became in a very brief lapse of time a grains commodities program. The full impact of this reversal is impossible to measure since one of the principal indicators will be FY 1988 requests and the types of projects proposed. What does seem clear is that the indefinite nature of the resources will continue to have a dominant impact on the other characteristics of the program. Additional delays will probably be inevitable until the problem of commodity availability is clearer; programs will require additional flexibility to be able to accommodate commodity changes; and all of the above will complicate the already diverse objectives by increasing the political nature of the program in the field.

Intentions and Consequences

What can be learned from the implementation experience of the 416 program to date? There would seem to be four interrelated propositions.

- Temporary programs tend to become ad hoc.

The last section demonstrated that by sifting through the data with a number of working hypotheses it was possible to

reconstruct a certain number of scenarios for what happened. Clearly, however, all of these are retrospectively imposed and might well surprise those who were actively directing the program. Statements that the program "grew like topsy" or that it "snuck up on the different agencies" suggest that no clear direction was available to the implementors.

- Ad hoc programs inevitably develop implementation problems

Well-structured, well-organized programs can at least rely on established objectives and procedures as management aids; ad hoc programs have only ill-defined procedures and inadequate structures upon which to rely. Even if the legislation had not changed rapidly, the program probably would have encountered difficulties; with the changes implementation problems, at least from the Washington perspective, became abundant. Whether Washington's implementation problems reflect field problems is another issue and will be examined in the next section.

- Implementation problems decrease the legitimacy of the program

Whether the implementation problems are controllable (as in the case of proposal review) or not (as in the case of commodity unavailability), they affect the legitimacy of the program. Poorly presented or understood guidance, inexplicable or unexplained delays, political and administrative problems out of proportion to the amount of food involved, all of these undermine commitment to the program in Washington and credibility of the program in the field.

- Decreased legitimacy forces management to confront the problems above simultaneously rather than sequentially.

AID/W's organizational and operational changes represent an effort to address a number of problems simultaneously. The risk is that these changes may be treating the symptoms rather than the disease; that is, by not addressing the fundamental issue of the temporariness of the program, these changes may only be the latest in the series of ad hoc responses

DID WHAT HAPPENED HAVE THE DESIRED RESULTS IN THE FIELD?

The preceding two sections suggest that an understanding of the 416 program is a matter of perspective and choice. Emphasizing certain indicators or focussing on certain years yields quite different interpretations of what was occurring. At the same time, these sections underscore several real problems associated with the question of the results of the program.

The first concerns the categorization of the different projects according to the type of intervention, since as the preceding section showed, definition of program objectives and project characteristics was deliberately left vague. The second involves the selection of the different countries and projects, since as the first section demonstrated, the concentration of the 416 program in certain countries raises the issue of country and

project representativeness. The third involves the measurement of the effects and the impact, since no measures were proposed by the program.

Categorization of Project Results

Based on a reading of the project proposals, four principal programmatic areas were identified. These are listed below.

- Humanitarian projects including major sub-areas for institutional feeding and structural adjustment;
- Human resource development projects including major sub-areas for education (school feeding) and health (MCH);
- Economic development embracing a broad range of activities from Food for Work to village self-help to cooperatives to food transformation; and
- Emergencies including floods, earthquakes, drought, refugees, and so forth.

Clearly, the categories contain room for overlap, and in addition, almost two-thirds of all projects had multiple objectives.

The table below presents the proportion of projects with objectives in the different programmatic areas.

TABLE 16. Categorization of project objectives

	1983	1984	1985	1986	1987
Humanitarian					
-Institutional feeding	50%	39%	39%	26%	55%
-Structural adjustment	20	26	23	16	13
Human Resource Development					
-Education	60	57	34	48	58
-Health	45	26	36	57	47
Economic Development	25	22	14	26	30
Emergencies	10	17	43	47	13

While there are no obvious trends in this table, the data suggest several considerations linked to the intended results in the field.

First, while in the most general sense, the project objectives are limited to feeding the needy, the different categories indicate not only the complexity of translating abstract objectives into specific projects but also the inherent constraints of multiple demands on limited supplies of commodities. For example, to the extent that the 416 program attempts to respond to emergencies, other categories of program objectives will probably be adversely affected.

Second, while the table demonstrates the potential flexibility of the program, it may also indicate certain limits on this flexibility. Comparison of 1987 and 1983 may suggest that during a period of commodity uncertainty, projects favor more traditional objectives (institutional and school feeding) over less traditional objectives (structural adjestment and health). Stated somewhat differently, efforts to shape the directions of the program can probably only occur during a period of commodity stability.

In the end, the categorization of project results (or more accurately anticipated project results) show the difficulties of attempting to combine limited objectives, flexible programming, and indefinite resources. That the 416 program basically succeeded in doing so attests to the viability of the idea and to the resourcefulness of the cooperating sponsors.

Representativeness of the Projects

While the previous section addressed the question of what results should be looked for in the field, there remains as well the question of where to look for these results. That is, the search for results must distinguish between two quite different sets of circumstances based on whether the cooperating sponsor had a single agreement or multiple agreements under the aegis of the program.

Of the 72 cooperating sponsors, 43 (or 60%) had a single agreement under the program; of the remaining 29 cooperating sponsors, 11 had two agreements, 9 had three, and 9 had four or more agreements. Of the former group, virtually nothing is known of their results, and their program emphases must be inferred from the program proposal. Information on the latter group exists primarily through the field studies undertaken by this evaluation. These field studies concentrated exclusively on the latter group and within that group primarily on cooperating sponsors who had at least three agreements under 416. Overall, the cooperating sponsors evaluated in detail by the different studies represent an eighth of the cooperating sponsors, a quarter of the agreements, and a half of all commodities.

Clearly, the programs which were evaluated comprise a significant part of the 416 program; just as clearly, they constitute a distinctive version of it. On a year-to-year basis, there were differences between the sampled and unsampled projects; for the total period, two major differences stand out. First, a significantly higher proportion of the sampled projects were engaged in human resource development activities (64% to 38%). Second, a significantly higher proportion of the unsampled projects were engaged in emergency activities (34% to 12%). Humanitarian activities (30% to 32%) and economic development activities (21% to 24%) were virtually identical between the unsampled and the sampled projects.

The field studies which represent the best source of information on the 416 program also probably represent the 416 program at its best. That is, the sampled projects were of relatively long duration, with relatively stable (until 1987) commodities, and in program areas clearly compatible with the development of flexible approaches.

Measurement of Project Results

In the same way that a description of project activities required some categorization of the different types of projects, consideration of the effects and impacts necessitates an organizing framework. This report adopts the hierarchy of results implied by AID's analytical framework and organizes the results in terms of inputs, outputs, purposes, and goals.

Inputs. Unlike many other kinds of assistance, food aid has the potential to generate additional resources, or inputs, which may then produce additional outputs. The effect of the 416 program on the mobilization of resources is well-documented in the country studies, both with respect to human and material resources and with respect to financial resources.

Firstly, the 416 program has contributed to the mobilization of both human and material resources. The Peru evaluation cites the community kitchens (comedores), "organized by women's clubs to provide an efficient cooking and feeding center using pooled material and human resources." (page 10) The Mexico cities instances of voluntary labor and the contributions of service clubs such as the Lions, Rotary, the Order of Malta, and so forth.

Secondly, the 416 program has generated significant additional financial resources, both directly and indirectly. Directly, the contributions required of beneficiaries in many instances and, in the case of certain U.S. PVOs, the monetization of portions of the food, represent considerable resources. Indirectly, governmental contributions in the form of customs exonerations, rail transportation, administration, and the like represent significant contributions to those in need which might not otherwise have been made.

While data on the value of human and material resource contributions are difficult to calculate, and data on financial resource contributions are incomplete, there seems no question that the 416 program generated considerable resources over and above the value of the commodities. In this respect, the commodities constitute a catalyst for the generation of other resources, and since these additional resources are directly toward the most needy, the 416 program had a certain multiplier effect.

Outputs. In the first instance, additional resources enable an implementing agency or a cooperating sponsor to improve its

management, thereby becoming a more viable and creative institution. In the second instance, improved agency management should translate into the initiation, improvement, and expansion of services. The synergistic nature of these different outputs is suggested by the Mexico report's conclusion that "participating Mexican PVOs have improved effetiveness, strengthened development programming, broadened coverage and volunteer activity, and mobilized new donors." (page vii)

The effect of additional resources on the cooperating sponsor is most clearly demonstrated in the cases of DIF and the Government of Tunisia. In the former case, the report notes that one of the outcomes of 416 has been "the institutional rehabilitation of DIF into an effective leader of the national social development effort." (page vii) In the latter case, the evaluation argues that the 416 program helped "to ensure that the child feeding programs were not only on sound footing but possessed adequate infrastructure, trained personnel and had a sufficient transport capability to maintain an institutional integrity well into the future." (page 19)

Examples of the initiation, improvement, and expansion of services abound in the evaluations. The best example of initiating services is that cited in the Peru report and stating that

> the principal role of the feeding programs seems to be that of promoting community organization, the establishment of women's clubs, building of community kitchens, and have brought health services to communities that would not otherwise have been exposed to them. (page 16)

Improvement of service delivery has generally involved the addition of certain complementary activities, notably health education. Expansion of services has tended to be extensive rather than intensive, sometimes promoting maximization of coverage to the detriment of optimization of services.

Purpose. The impacts of the 416 program's food and the complementary activities associated with it have been both directly productive and non-directly productive. In the former category are activities such as family gardens, animal raising projects, income generating projects, and the like described in the Chile report (page 18), the Mexico report (page 107 and elsewhere), and the Peru report (page 14). In each of these countries, food has been used to promote economic independence among the poor beneficiaries. While the reports indicate that such activities are widespread, descriptions tend to be anecdotal rather than quantitative.

In the category of non-directly productive project are those which rely on food to increase the knowledge and change the attitudes and practices of the beneficiary populations. Reports from each of the countries acknowledges the incentive effects of

food, particularly with respect to health and education. Food has both brought families (and especially mothers and children) into contact with services and kept them in contact, though the Chile study indicates that this may be less the case with respect to health. (page 18)

Whether in the short-term or the long-term, the 416 program has contributed to the increased productive capacities of the beneficiary populations studied.

Goals. Based in part on the categorization of project objectives noted earlier and in part on data collected by the field studies, 416 program achievements have been organized in terms of their contribution to socio-economic development, their effectiveness in alleviating the effects of emergencies, and their political impact.

Of these three categories of impact, the largest amount of data exists for the first, which comprises nutritional and health status, educational development, and economic development. With respect to nutritional status, each of the evaluations attempts to assess the impact of the 416 program with radically different results. The Chile program, and in particular PNAC, presents the most comprehensive data with respect to malnutrition, and these indicate Chile's "impressive maintenance" of nutritional status during their economic crisis. (pages 5 and 11) The Mexico program presents no such systematic data, but SHARE undertook an evaluation which found that "the program had a positive and significant effect" on nutritional status. (pages 60-61) The Tunisia report states that "no studies exist to support or refute claims to improved status under the program," but that "reliable anecdotal reports are that far fewer cases of malnutrition are being seen in hospitals today." (page 17) Finally, the Peru report concludes that "ration dilution in the past makes it extremely doubtful that the food has had an impact on the nutritional status of the beneficiaries." (pages 16)

None of the other aspects of socio-economic development exhibit quite the range of measures and results as nutritional status. In fact, data regarding health status, educational development, and economic and community development, all consist of descriptions of activities rather than of impacts.

With respect to the effectiveness of the 416 program in alleviating the effects of emergencies, the field studies examined the cases of Chile and, especially, Tunisia. In both cases, commodities arrived later than desired but not so late as to be useless; this result, combined with earlier discussion of the delays may not be the most appropriate response to an emerbency requiring fast response. Because in Tunisia the beneficiaries were populations affected by economic adjustment measures being taken during a period of drought, (page 18) the evaluation was less concerned with measures such as the number of lives potentially saved than with the economic impact of wheat distribution to the needy. Using the value of the wheat, the

evaluation concludes that during the two month distribution period, the wheat "may have constituted 17% of available resources for consumption." (page 18)

Measures of the political impact of the 416 program are the most difficult to conceptualize, but two aspects need mention. First, with respect to the positive benefits for the U.S. image abroad, each o the evaluations mentions the favorable publicity generated, even if, as in the case of Mexico and to a lesser extent Chile, the traditional markings are absent. These two cases also offer the caveat that commodity instability and particularly the manner in which it is handled will rapidly attenuate this impact. Second, with respect to U.S. foreign policy goals, there seems little doubt that, over and above the ipacts noted above, the 416 program has contributed to the social and political stability of a number of countries. Indeed, the case of Chile provides an example of where the symbolic value of the food may have been more important than its real value.

Results Revisited

As might be expected with a program which was by definition temporary and by nature ad hoc, the emphasis was on short-term effects rather than long-term impact. Project objectives evolved as opportunities presented themselves, and evaluation measures were never a real priority. For these reasons, appreciation of the results of the 416 program is made difficult.

On the one hand, the sample of countries evaluated probably presents the best case for the 416 program, and even so is not without significant difficulties. Apart from the question of the lack of data concerning the impact of the program, the questions of cooperating sponsor capability and commodity stability need to be addressed. While reports from Chile and Mexico describe an extremely competent institutional network, the Peru evaluation is hardly flattering. To the extent Chile/Mexico or Peru represent the norm of the cooperating sponsor, the results may be better or worse than those described here. Finally, regardless of the competence of the cooperating sponsor, the phenomenon of commodity uncertainty reduces the impact of the program.

FINAL CONSIDERATIONS

Reexamining the three questions which have provided the organizing structure for this chapter, it seems that they might also have been posed in a slightly different manner. First, rather than asking what happened, a more appropriate question might be whose program is 416? Previous discussion demonstrates that the 416 program evolved partly as a function of Washington's efforts to define appropriate activities in the field but also partly as a function of the field's efforts to influence Washington's choices.

Second, rather than seeking to understand the translation of legislative intent into action, a more appropriate question might

simply be why was the 416 program run as it was. The response depends in part on the answer to the previous question and in part on the niche which the 416 program created for itself. There can be little doubt that the program's characteristics responded to a real need on the part of Washington and the field, and if the program never turned out to be exactly what either side thought it was or should be, it retained enough advantages to be politically viable.

Third, rather than holding the cooperating sponsers accountable for objectives which may not have been made clear to them, a more appropriate question might be how they were able to acomplish what they did given the imprecision of the program. Because the 416 program was a program for which expectations could so easily be aroused and for which commodity constraints would inevitably follow, implementation could be especially painful.

In the discussion which follows in the next chapter, the report returns to these questions and the issues which they imply.

CHAPTER III: ISSUES ARISING FROM THE 416 PROGRAM

Many of the issues concerning the 416 program are apparent in the discussion of program results contained in the previous chapter. This chapter seeks to categorize them in a slightly different manner and to present additional information in order to increase understanding of their complexity. First, a broad set of categories attempts to organize the issues in three different ways:

- those issues resulting from the historical circumstances of the program;
- those issues associated with the roles and responsibilities of the implementing structures;
- those issues relating to the notion of fit between beneficiary needs, program design, and the capacities of the assisting organization.

Second, within these broad categories of issues, discussion will focus on specific issues susceptible for improvement. The chapter will demonstrate that the interdependency of the broad categories complicates resolution of the specific issues.

ISSUES ARISING FROM THE HISTORICAL CIRCUMSTANCES OF THE PROGRAM

These issues are of two sorts. There exist firstly those issues which have been built structurally into the program over time through the legislation and through the relationships created by the implementation of the legislation. These issues represent fundamental questions on which there has never existed full agreement. There exist secondly those issues which arise periodically and which exacerbate the structural issues.

Structural Issues

Three kinds of structural issues involving program resources, program emphasis, and program control have dominated the implementation history of this program.

Resources. The residual nature of the commodities available for the 416 program means that foreign donations will have the last claim on existing stocks after sales and domestic donations. There exists, therefore, between AID/W and USDA (and more correctly the Commodities Credit Corporation) a fundamental difference with respect to the commitment of resources. Given CCC's legislative mandate with respect to its surplus commodity assets, it will seek to maximize the proportion of stocks sold

and, in the event of foreign donations to minimize its costs. Where this priority runs counter to AID/W's programmatic commitments, there must clearly be disagreement.

Emphasis. The objectives of the 416 program serve as well to delineate differences between USDA and AID/W with respect to program emphasis. Throughout the history, USDA's primary interest has been in the objective to reduce surplus stocks while AID/W's has been in the objective to feed the needy overseas. Programmatically, these interests are reflected in the two basic documents necessary for approval of a particular project, the agreement and the plan of operations. The agreement represents a contractual agreement to deliver specified quantities of commodities at agreed upon dates; the plan of operations represents a statement of intent for the effective use of the commodities. That USDA should focus most carefully on the document with clear legal status while AID/W should be most concerned with the program description speaks to the different program emphasis each agency brings to the program.

Control. In the beginning, 416 was exclusively USDA's program, but it did not remain so for long. Early on, AID/W argued that it should have increased program implementation responsibilities by virtue of its experience in food aid, its existing staff in the field, and its technical review capabilities in Washington. Since 1983, a series of memorandums of understanding have been negotiated which link the two agencies. From AID/W's point of view, the operative sections are those which divide the labor, retaining program review and monitoring responsibilities for itself and assigning logistical responsibilities to USDA. For USDA, the operative phrase of the different memorandums is that which designates AID/W as the agent of CCC to carry out certain responsibilities and which thus retains overall responsibility for the program for USDA.

Put in the best of lights, the subsequent implementation of the 416 program may be seen as a continuing effort to accommodate these differing points of view; put in the worst of lights, it may be seen as a permanent battle for turf without regard for the consequences in the field. Whichever view is subscribed to, and the truth undoubtedly lies somewhere in between, these issues remain as critical today as they have since 1983.

Exacerbating Issues

If each of these structural issues has been a more or less constant source of misunderstanding and contentious discussion between the agencies, why have they not been obvious? A possible answer lies in the nature of the resource on the one hand and in the existence of an issue on which these differences could focus.

Stated somewhat differently, commodity availability and monetization have been issues surfaced periodically and which

have crystallized many of these underlying issues. Table 12 graphically demonstrates the importance of these issues of commodities, contributions/use of monies, and management.

Commodity availability. As long as dairy supplies existed in sufficient quantity, most of the fundamental differences could be resolved. Once there were competing claims on limited resources, these fundamental differences could not be glossed over. Discussion over the availability and commitment of resources quickly became a discussion about the emphasis of and the control over the program.

The ensuing struggle revolves around the question of whether the agency controlling the supply of commodities or the agency controlling the demand for commodities really determines the program emphasis. In this context, the debate about legislated minimum quantities and the questions of what they ought to be, when they can be announced, whether the agreed-upon minimums can be communicated to the field, and so forth take on real significance. At the heart of the matter is the issue of whether Section 416 can reduce the effects of the inherent commodity uncertainty.

Monetization. Discussion of the financing of complementary activities and of monetization represents in many ways a touchstone for the relationship between AID/W and USDA. In the first instance, the issue involves a matter of principle: Should recipients ever have to contribute financially in order to receive donated food? The arguments for and against depend largely on the characteristics of the recipients, and the answer has never been definitively settled.

In the second instance, the issue involves the potentially political matter of whether the sale of commodities in oftentimes sensitive foreign markets should be undertaken by PVOs or through the established mechanisms of the CCC.

Finally, the issue involves the practical matters of whose funds are involved, how they will be used, and how they will be accounted for. From AID/W's point of view, monetized commodities represent additional development resources of increasing importance in a period of declining budgets. From USDA's (or more accurately CCC's) perspective, commodities represent assets of a private corporation which by law must account for them.

In summary, these issues arising from the historical circumstances of the program provide the context for the other two major sets of issues. Their effect on the management of the program will be seen in the next section; the impact of management on the operations in the field will be examined in the last section of this chapter.

It is important to note that all of these issues involve significant questions over which reasonable people can disagree.

Nevertheless, despite the fundamental differences of opinion about the intent of the legislation and the desirability of certain program options, the agencies have managed to implement Section 416. They will, however, continue to experience sometimes inordinate difficulties until these differences of opinion are resolved.

ISSUES PERTAINING TO THE RELATIONSHIPS OF THE IMPLEMENTING STRUCTURES

These issues primarily concern the management of the 416 program both in Washington and in the field; they link, therefore, a general context and its specific consequences. That is, the notions of structure which implies permanence and relationships which imply predictability were insufficiently addressed by a program which was to be temporary; when the program could no longer be qualified as temporary, the structures and relationships were inadequate for effective implementation of the program.

The discussion which follows is organized around the four basic tasks of management: planning, organizing, staffing and directing and controlling. Each must be examined both from a Washington perspective and from a field perspective.

Planning

At issue in much of the debate about the nature of Section 416 is whether it is a program or a set of discrete projects; this, in turn, is linked to the inherent uncertainty of the commodities and to the question of planning in such a context.

Among the Washington agencies, the questions of whether to plan and how to plan for the use of 416 commodities have never been resolved. The result has been

- an absence of long or even short-term goals;
- multiple and sometimes contradictory objectives;
- a lack of priorities for country or program selection.

Under normal circumstances, this result would constitute a planner's nightmare, but since the program has no direct future budgetary implications, the consequences of the situation are not immediately apparent in Washington.

The consequences in the field are apparent, however, and are best illustrated by the case of Chile. After the legislation of 1985 permitted multi-year planning, Chile submitted a five-year plan for Section 416 activities involving, as the country evaluation states, "a gradual reduction in the size of the program and a shift of allocations from Government to the PVOs." Despite this careful planning, Washington remained unresponsive and the result has been "a Section 416 Program ... divorced from

meaningful fiscal year planning." As a result, the Chile study concludes, "agencies are using commodities as and when they arrive, but no longer include Section 416 donations in their planning"(page 8).

Both the Tunisia evaluation and the Peru evaluation call for multi-year planning as well. The Mexico evaluation, arguing that "Section 416 can be serious business only with some multi-year guarantee of food availability," (page 116) pinpoints the difficulty of multi-year planning, namely that planning without the assurance of some level of resources is an exercise in futility.

In the final analysis, two aspects of the issue of planning must be addressed. The first concerns the source of the incentive to plan: until and unless incentives for planning exist in Washington, planning in the field will occur in a vacuum and will probably consist primarily of planning around 416 commodities and not for 416 commodities.

The second concerns the information necessary to plan: whether or not Washington eventually resolves this issue of planning, it must provide increased and improved guidance to the field with respect to developments in the program. If broad guidelines outlining objectives and priorities are not possible, then detailed information must be made available in order that cooperating sponsors be able to undertake their own planning in a meaningful way.

Organizing

Working backwards from the field, the organization of the 416 program must consider three broad steps:

- From receipt of the food in-country to distribution of the food to beneficiaries;
- From receipt of the fully signed agreement to receipt of the food in-country; and
- From receipt of the proposal to receipt of the fully signed agreement.

Each of these steps involves different organizing principles and must be considered separately.

Receipt in-country/distribution. With the caveat of the representativeness of the countries evaluated (as noted in the previous chapter), the organization of the different cooperating sponsors in the field seems to have been exemplary. The Mexico report concluded that

> all sponsor agencies visited and the individual offices through which they distribute commodities have far better logistic systems, recipient records, and trained staff

> than are common in most other AID-assisted food programs in the world. (page 97)

Similarly, the Chile report notes that "all three organizations target food and other services well, manage food distribution proficiently, and collect the information needed to measure impact and keep donors informed." (page 17)

More serious problems were found in Tunisia and in Peru, linked principally to offloading of stocks and beneficiary selection in the former case and ration quantities in the latter case. In both cases, the reasons may be attributed in part to actions elsewhere in the organizational sequence. In the Tunisian case, problems were related to the step between signature of the agreement and receipt of the commodities in-country, that is the organization of the shipment and receipt of the commodities.

In the Peruvian case, the report states that "many of these problems (of ration quantities) stem from lack of fiscal year programming procedures for the Section 416 program and commodity uncertainties inherent to the program." (page 13) The result has been that

> Rations change from year to year (depending upon availabilities) and ideas do not become fixed in the minds of handlers as to who gets what (and why), nor the concept of what may be sufficient to have a health impact. (page 13)

The Mexico report argues that "Advanced Developing Countries offer the most appropriate setting for Section 416 projects," and concludes that

> While few ADCs can match Mexico's institutional framework, human resources, and private capital, all can integrate the temporary commodities into existing programs more effectively than less developed countries. (page 109)

If Mexico's characteristics were to be adapted as general organizational qualifying criteria, many countries would obviously be eliminated, but implementation problems for those that remained would certainly be reduced.

Agreement signature/receipt in country. This step in the organizational sequence was most certainly the least studied by the evaluation. In practice, once the agreement has been signed by all three parties, it is transmitted to USDA's Kansas City Commodity Office (KCCO), which carries out CCC's legislative responsibility to supply the commodities for approved programs.

KCCO's procedures for procurement and shipment of commodities are well-documented and the export schedule provides

a detailed description of the steps required. Problems related to this step in the organizational sequence had less to do with KCCO than with the inexperience of certain cooperating sponsors on the one hand and the unjustified expectations for rapid delivery of commodities on the other.

The inexperience of some of the PVOs new to food aid was evident in their unfamiliarity with the procedures necessary to initiate the commodity flows. For instance, there were often delays because the cooperating sponsors did not realize that they had to identify a freight forwarder before other steps could occur. Other aspects were sometimes either not well-explained by the USAIDs or AID representatives or not well-understood by the cooperating sponsors.

Due in part to their unfamiliarity with established procedures, cooperating sponsors often complicated the work of KCCO by requesting specific types of commodities or by changing the delivery dates of these commodities. The former problem is a relatively recent one, linked to the increasing range and presentation of commodities offered under the 416 program. The latter is of longer duration and is linked to long approval times and fiscal year deadlines.

Of these problems, the last is the most acute, since it creates expectations in the contractual agreement that after long approval delays, delivery of the commodities will occur almost instantaneously. That is, more than a few agreements have their initial delivery date in the same month or the month following the signature of the agreement. This sets unrealistic expectations for KCCO as well as for the cooperating sponsors.

Proposal submission/agreement signature. The evaluation reports from the field are virtually unanimous in their strong criticism of this step in the organizational sequence. While the structure for 416 proposal review, namely the DCC, was the same as for Title II programs, it did not function adequately in the case of this program. In particular, criteria for assessing the adequacy of a proposal seem to have been almost arbitrary and information concerning the whereabouts of the proposal in the review process almost nonexistant.

Despite the fact that Regulation 10 outlines in some detail the kinds of information that must be included in a Section 416 proposal, it obviously cannot spell out the quality of the information required. What constitutes an acceptable plan of operations requires the judgment of a variety of participants on the DCC. What is striking in reviewing the 130 or so agreements is the disparity in the quality of the proposals. They range from 2 to 200 pages (including attachments) and the long proposals do not seem to have been more persuasive to the DCC than the shorter ones. Despite the sometimes frequent cables requesting additional information, plans of operation were rarely

substantially modified. In short, without adequate review criteria, a completely justifiable review process became needlessly tedious and unaccountably long.

Compounding the difficulties of the review process was the lack of information concerning the progression of the proposal through the different steps. While the delays were frustrating and dismaying to the cooperating sponsors, the lack of information was infuriating. The ambiguousness nature of the process encouraged parallel efforts, through Congress and even through the President, to determine where the proposal was and when it would be approved. Not a few proposals lay dormant for months, only to be rapidly resuscitated and approved. A proposal review process with clear steps and maximum delays would have resolved many of these problems.

In sum, quoting the conclusion of one of the program evaluators, "it is difficult to separate (the organizational) inadequacies of country programs from weaknesses inherent in the 416 concept and Washington administration of it." (page 2) On the one hand,

> because programmers relied heavily on the best existing institutions and infrastructures;, commodity distribution has usually reflected the countries' highest capabilities. Even in Mexico, where some U.S. PVOs new to international activities became sponsors, local operations soon reached adequate or superior levels. (page 2)

On the other hand, as the previous section noted, AID, USDA, and the members of the DCC were unable and probably to some extent unwilling to organize themselves to overcome the weaknesses and contradictions of the program. What is unfortunate is that "these limitations, and the failure to deal explicitly with them, clearly reduced effectiveness of 416 programs in the four countries evaluated." (page 2)

Staffing

From the inception of the 416 program, the crucial role of staffing the program was recognized. As outlined by the initial guidance cable of 1983, three principal tasks were identified:

- close coordination. . .in the development and approval of Section 416 projects to assure that they complement other U.S. assistance efforts;
- program management and control; and
- verification of the effectiveness of sponsor control systems.

The guidance cable was most explicit with respect to the assignment of the latter two tasks, with cooperating sponsors and recipient governments to be used "to the maximum extent possible" for the second task and "U.S.G. representatives" responsible for the third. Presumably, the first task was to be shared by

Washington and the field, but the division of labor was never made clear. By and large, the conclusion of the different field evaluations is that staffing by the cooperating sponsors and recipient governments was generally more than adequate, but that confusion about responsibilities among Washington agencies and between Washington and the field combined with a lack of staff resulted in ineffective support for the projects.

Evaluation of staff performance of the cooperating sponsors range from praise for the Chilean and Mexican programs to guarded commendation of the Tunisian program to reservations about Peru's ability to staff adequately the 416 program. Because such judgments involve hundreds of distribution sites and thousands of persons, they must obviously be accepted with prudence. A closer appraisal of the African experience would probably be needed in order to determine the range of tasks and the levels of proficiency required of personnel in the field and the availability of such personnel. Appreciation of staff performance of Washington-based personnel was not nearly so positive. For the most part, they were viewed from the field as sources of delay, annoyance, and in the worst case, sanctions (audits and suspensions). Certainly, not all of the complaints were completely justified, but Washington was the victim of staffing problems, both with respect to the number of staff and with respect to the division of labor between AID/W and USDA.

Both problems date from the early days of the 416 program and involved questions of both competence and control. In 1983, AID/W argued that not only did USDA lack the necessary number of personnel abroad to implement the program but also that its few representatives abroad were more attuned to seeking improved U.S. agricultural export markets than to designing and implementing food assistance projects. While this argument was undeniably true, its corollary that therefore USDA staff in Washington were not in a position to run the program was never accepted by USDA. Neither USDA nor AID/W was ever able to appoint their desired number of program personnel, and the establishment of essentially parallel review and approval processes dissipated the limited staff time.

Recent decisions taken by AID/W to distribute country responsibilities for 416 and to monitor the proposal review and approval process need to be monitored in order to determine whether they will be sufficient to improve staff performance.

Because of the staffing problems in Washington, certain of the tasks which were to be accomplished there fell to the USAIDs and embassies. The field evaluations are unanimous in their praise for this personnel; while unable to dedicate even a majority of their time to the 416 program, it seems clear that their interventions have been timely and helpful. Both a more careful analysis of the distribution of tasks between Washington and its field offices and a determination about the need for additional staff should be undertaken.

Directing and Controlling

Three interrelated issues were addressed by the field studies and concerned whether data were collected, whether the analysis of such data was incorporated into certain management decisions, and whether the data were systematically reported to Washington.

As to the collection of data, the field studies indicate a range of responses. The Chile report notes the country's long experience with food aid recordkeeping and states that data are collected on a regular basis (page 10). At the other extreme is the case of Tunisia where the evaluation observes that "the monthly reporting system described in the Agreement was impractical, not required by 416 and certainly not carried out." (pages 15-16) Both the Peru report and the Mexico report note the diversity of data collection systems. The Peru report argues that the reporting system for monitoring the 416 program needs simplification and more appropriate indicators (page 16), while the Mexico report states that "the temporary nature of Section 416 support discourages development of evaluation systems related to it." (page 96)

In short, in terms of the collection of data for purposes of monitoring and evaluation, data appear to exist though not in a fashion which would permit comparisons from country to country. Use of data for management of the projects also seems widespread in the selected countries. Even in Tunisia, the report states that "monitoring staff detected problems of sales and faulty distribution, were available to help solve problems, and reported through a systematic follow-up mechanism." (page 15) In Chile and Peru data were incorporated into decisions concerning beneficiaries, and in Mexico certain organizations have already examined the potential effects of food termination on their activities.

Where all of the projects have been deficient has been in fulfilling their reporting requirements to Washington. No cooperating sponsor has systematically submitted the periodic reports described in Regulation 10 and included as a requirement in the contractual agreement. Given the limited staff and supervision budget of the program in Washington, it is not clear that submission of these reports would have resulted in improved management of the program, but it certainly would have facilitated occasional evaluation.

ISSUES RELATING TO PROGRAM FIT

Certain analysts have argued that successful assistance efforts require "a high degree of fit between program design, beneficiary needs, and the capacities of the assisting organization." (Korten, 496) Presented graphically as a kind of triangle, the importance of the interrelationships becomes clearer:

program

beneficiaries organization

Each of the program elements is thus linked to the others in a mutually reinforcing manner which over time may even assume significant political proportions.

The most succinct example of this phenomenon is cited in the Chile report where school feeding programs, run by organizations of great competence, have provided milk to children for many years. Summing up the interrelationship of the program elements, the report suggest that the "longstanding national commitment to a daily glass of milk for every child. . .[means that] serious political consequences are expected to follow any attempt to eliminate milk." (page 24) Stated in terms of the program elements above, elimination of milk ruptures the organization's (PNAC) ability to provide a program (school feeding); disruption of the program means that beneficiaries (school children) will be deprived of the nutritional value of a glass of milk; and the credibility of the organization's commitment to a particular population will be called into question.

While the example above suggests the potential risks inherent in the relationships, the field studies mention a number of examples of programs which have gained momentum in the same manner. What is at stake in this notion of fit is the issue of interdependency and whether it is qualitatively different from the dependency which so many food aid programs seek to avoid.

The difference between the two ideas may be seen by adding some details to the triangle above:

program

activities technical capabilities

kind/quantity of food investment

source of food

beneficiaries credibility organization

Dependency, as addressed generally in the field studies, seems to entail three separate but complementary ideas:

- of a beneficiary population whose nutritional status is linked to certain types and sources of food;
- of a program whose technical capabilities and activities depend on food;
- of an organization whose finances and credibility are invested in food.

Interdependency focuses on:

- the favorable effect of food on the realization of certain activities, notably health and family planning;
- the benefits of the creation of an absorptive capacity for food, including the necessary infrastructure and logistical organization;
- the socio-political value of a credible response to the real needs of diferent segments of the population.

In short, examination of the different relationships must emphasize both the "positive" and "negative" aspects because they are truly inseparable.

Issues Involving program Design and Beneficiary Needs

While there can be no doubt about the catalytic effect of food for the initiation, improvement, and expansion of activities, two additional issues concerning the quality of the food ration and the viability of the activities also must be addressed.

Incentives and Needs. The Mexico report makes an important link between the kinds and quantities of food on the one hand and the types of activities on the other. The report posits two hypotheses which merit attention:

- Because the ration is small, it is viewed primarily as family budget support and a catalyst for other activities, rather than as a nutritional supplement. (19)

- Commodities other than milk serve primarily to maintain income or as incentive for participation in development activities. (101)

These in turn suggest that program design concerns (and in particular the desire to avoid dependence) and beneficiary needs may not always be wholly compatible: What serves as an incentive may not entirely respond to needs and *vise versa*.

The Mexico report argues that programs avoid dependency by focussing on what are essentially design issues:

> by using food as a temporary incentive for becoming self-sufficient, as an inducement to use existing services, and as short-term compensation for the ravages of structural adjustment. (page 105)

Conversely, as the Peru report points out, dependency seems far more probable in projects which focus on need:

> Needs were never expected to be short term or temporary. Quite the contrary, the foods have been and will continue to be the key program resources, and their presence needs to be assured and planned on a multi-year basis. (page 1)

While it is clear that the distinction between food as a tool for change and food as a response to need is not unambiguous, emphasis would seem to be important for what constitutes an appropriate project for the 416 program.

Food as a Response to Need. Within the constraints just identified of emphasizing this aspect of the 416 program, two issues need mention, the appropriateness of the food and the quality of the ration. With respect to the appropriateness of the food, the importance of milk to all the programs except the Tunisian program must be noted. Both the Chile report with its reference to the "mystique" of milk (page 24) and the Mexico report with its allusions to milk as the symbol of "parental concern" and of "low-income group aspirations toward middle class consumption patterns" (page 101) demonstrate the significance of this particular commodity. Reliance of especially vulnerable populations on a particular commodity and the expectations thereby established produce the worst scenario for dependence and its consequences.

Related to the problem of milk is that of the dilution of rations as commodities (and especially milk) become scarce. The case of Peru has already been cited, but the other reports note reduction in ration size, coverage, or regularity which are also worrisome. If what works as an incentive has marginal or no nutritional impact, then the program needs reexamination. The question of how much food is enough is perhaps the most poignant question of food assistance.

Food as a Tool for Change. In the same way that beneficiaries can become dependent on donated food, programs can too, since, as the Mexico report state, "continued use. . .allows them to avoid testing whether their services will be accepted without it." (page 104) Additional study of the linkages between types of food, types of services, and continuation after termination of food would be needed before accurate predictions concerning when, how, and for how long programs require food as incentives or inducements.

Issues Involving Organizational Capacity and Beneficiary Needs

While the previous section emphasized the relaionship between people and the oftentimes abstract notion of program design, this section concentrates on the relationship between the people of the community and the people of the organization implementing the program. This human aspect of development highlights the issues of the confidence of the beneficiaries in the cooperating sponsor and of the influence of the cooperating sponsor on the beneficiaries.

Confidence. Although food may provide an effective entree into new communities, it does not immediately create confidence between skeptical recipients and donors. Rather, as the DESMI case illustrates, food enables staff to win the confidence of local residents. (pages 42-43) Trust and credibility may follow, but they are dependent on the continuity of the food and therefore very fragile. The Mexico report describes the effects of ruptures of food distribution on the credibility of DESMI:

> During these months, DESMI was forced to renege on commitments to beneficiaries, fend off obscene phone calls and threats of violence, and placate irate participating bishops whose own credibility was jeopardized along with DESMI's. (pages 37-38)

The report concludes that "the lack of continuity undermined credibility, crippled staff, and alienated beneficiaries." (page 45)

As the Mexico report argues, credibility depends on continuity; continuity depends on stability of delivery even more than on quantity or quality of commodities; and orderly termination requires advance notice and the development of contingency plans. (page 107)

Influence. While the DESMI case demonstrates the risks of basing credibility on a source of food, the DIF case illustrates the opportunities for influence. The Mexico report quotes DIF's director as stating that 416 created "the basis for dialogue between DIF and the community" and that "by enhancing DIF's credibility, the food programs enable [the agency] to address such sensitive topics as family planning and drug addiction." (page 13)

Issues Involving Program Design and Organizational Capacity

Food serves both as a catalyst linking beneficiaries and program activities and as a source of credibility between beneficiaries and the organizations seeking to serve them; food also serves as a focal point for the mobilization of technical and financeal resources linking the organization and the inplementation of its program activities. Examples of food as a contributor to the institutionalization of services may be found both at the level of the individual organization and at the level of groups of organizations.

Institutionalization Within an Organization. As before, the cases of DESMI and DIF offer examples of the risks and opportunities inherent in food assistance. In DESMI's case, the Mexico report documents the manner in which this organization's technical capabilities were directed away from development and toward emergency relief: "The food distribution role clearly dilutes DESMI's earlier focus on development, since staff and money have been diverted to the emergency task." (page 45) Further, DESMI invested in significant infrastructure (page 36), on the premise that the program would continue. In DIF's case, the Mexico report argues that "its continuing transition from a paternalistic charitable agency to one emphasizing self-help and productive activities has been facilitated by its participation in Section 416." (pages 34 and 109)

On the one hand, it seems clear that organizations which are able to integrate food into an ongoing program run fewer risks than organizations which reorient their programs to accommodate food. On the other hand, this conclusion is somewhat facile in the sense that any significant activity in food assistance requires considerable investment and reasonable assurance of food availability. The Tunisian case represents an example of this; after 20 years of Title II assistance and a progressive phase-over, "the rationale for the [416] assistance was that the program needed infrastructural improvement for which no additional resources were available." (page 1)

Though food assistance can certainly drain an organization, there are numerous examples as well of its ability to identify and mobilize previously unknown resources, both public and private, and human and material. That certain organizations have been able to sustain such contributions is an indicator of considerable technical and managerial skills.

Institutionalization Among Organizations. The country reports describe two different situations:

- In the more advanced developing countries of Chile and Mexico, a government agency spearheads the coordination effort among local and foreign organizations.

- In the less advanced developing countries of Peru and Tunisia, government tends to be the only actor, but remnants of previous food aid collaboration can still be activated in times of need.

The Chile report has virtually no comment on the role of the coordinating agency in that country, but the Mexico report notes that "all food-related services must be approved by DIF, giving it the leverage to influence food distribution and complementary activities." (page 94) Two consequences are cited: the energizing of private participation in social and economic development (page 93) and the "remarkable explosion of innovative and useful activity." (page 94) The report concludes that "much that is now being institutionalized seems likely to survive and

the contribution of Section 416 merits recognition." (page 94)

In summary, the experience of the 416 program has served to highlight many of the issues of food aid in general and of temporary programs in particular. While the program has not been able to resolve the problem of dependency in its different guises, it has contributed to the development of program elements which attenuate significantly the effects of dependency.

FINAL CONSIDERATIONS

While it is possible to consider each of these three broad categories of issues independently or to classify some of them as "Washington" problems or "field" problems, they are in fact linked by a common theme. That theme concerns the relationship of the notions of program and uncertainty. The Chile report quotes local officials as categorically emphasizing "the need for increased certainty about allocations and deliveries if Section 416 is to be a 'program'" (pages 8-9); but tracing this theme back from the field may lead as well to the conclusion that it is precisely this uncertainty which is the defining and justifying characteristic of the program.

Starting from the issues relating to program fit, it is clear that implementing program elements when commodity availability is unpredictable represents an untenable demand on a cooperating sponsor. On the other hand, the field reports demonstrate the abilities of certain cooperating sponsors to cope with such unpredictability. The solution may well lie not in criticizing the 416 program but in acknowledging its distinctive nature and in applying more rigorous country and program suitability standards.

Moving to the issues pertaining to the relationships of the implementing structures, the observation can be made that the temporary nature of the program thwarted certain management initiatives which might have improved effectiveness. While perhaps slow to recognize this problem, AID/W and FFP have begun to institute changes which may resolve some of the problems noted. What is missing so far is an appropriate proposal review and approval process consonant with the distinctive nature of the 416 program. Consultant James M. Pines has suggested "a reserve of approved projects that are not time-specific or dependent on particular commodities," and this approach will be examined in more detail in the next chapter. What is important to note here is that creative approaches to the management of the 416 program are not only possible but necessary, and they will require reorientation of certain work routines.

Finally, with respect to the issues arising from the historical circumstances of the program, there seems little doubt that fundamental disagreements about the nature of the 416 program have resulted in ambiguous objectives for and guidance about the program. To the extent that these issues are political in nature rather than technical, their resolution is problematic;

however, if program history is any predictor, this uncertainty conditions the other uncertainties and makes them more difficult to resolve.

CHAPTER IV: RECOMMENDATIONS FOR IMPROVING THE 416 PROGRAM

With hindsight, what seems most interesting about the 416 program is perhaps not that it has had very real recent difficulties but that, for a fairly extended period, the program managed a remarkable juggling act--appearing to be an easily available source of food, fulfilling increasing expectations about the quantities of commodities available, providing a ready source of assistance for agency management to promise abroad, and so forth. Though perhaps increasingly far from reality and despite constant warnings that 416 was not a simple program, these initial perceptions persisted. Clearly, the 416 program fit in a very fortuitous way a food aid gap that its initiators could not possibly have completely envisioned. Just as clearly, in an era of declining development assistance resources, Washington was equally reluctant to define precisely the limitations of the program.

Within this context, two fundamental issues must inform the identification of recommendations for the improvement of the 416 program. The first issue is that of expectations, since as the Mexico report notes, "successive approvals of the same 416 project create a reasonable expectation of continued support, despite statutory language and reiterated statements about the temporary nature of Section 416." (page 124) Expectations were a major source of the program's strength but also of misunderstandings which ultimately weakened its effects. To be helpful, recommendations must be realistic about the potential for and limitations of the 416 program. Recommendations must resist the urge to argue that 416 would be a better program if only it were not 416; that is, the program would be more successful if, for example, multi-year guarantees of commodity availability were possible. Recommendations must, therefore, respond to the need to identify appropriate program opportunities. Such an approach would simultaneously increase the chances for project impact and reduce to manageable levels the problem of expectations.

The second issue is that of commitment, since as the Mexico report observes, "though DIF has not come to depend on Section 416, it has placed reasonable reliance on the program and inferred a corresponding implicit commitment that any reduction of support would be orderly and with adequate notice." (page 7) Commitments were perhaps the source of the program's most important successes, but they ultimately became as well the source of its greatest liabilities. To be relevant to the next period of the 416 program, recommendations must emphasize the last 6 months of program history as much if not more than the

preceding 54. Recommendations must, therefore identify potential sources of risk for project implementation. Such an approach would increase the appreciation of the roles and responsibilities of the different actors and reduce the sense of vulnerability which they all currently feel.

IDENTIFICATION OF PROGRAM OPPORTUNITIES

Based on the field studies, suggestions for the identification of program opportunities may be grouped by countries, by cooperating sponsors, and by project proposals.

Countries

Without reference to political factors which may influence the selection of countries, the reports indicate that the 416 program is most appropriate in countries where:

- there exists a tradition of concern and involvement in helping the needy

The cases of both Chile and Mexico demonstrate the advantages of what the Chile report calls a "national effort. . .to provide a safety net for those most vulnerable nutritionally." (page 17) The existence of a sense of social purpose, the creation of a viable infrastructure, and the development of competent public and private networks--these are clear indicatiors of a history of national effort.

- the government has established clear priorities for target groups or for beneficiary populations

The cases of both Chile and Peru indicate decisions about those groups which are most vulnerable. In Mexico, DIF has established elaborate criteria and analysis for reaching the "poorest of the poor" (pages 24-25), but such breadth may be inappropriate for the 416 program.

- there exists the distinct probability of mobilizing additional resources locally

If the 416 program is to contribute more than food, it must provide the catalyst for the generation of human, material, and financial resources. The cases of both Peru and Tunisia suggest that governments alone cannot provide the impetus for the mobilization of resources; rather, the effort requires the conjugation of public and private efforts.

- disincentives to local production and commercial imports are minimized

For both domestic and foreign political reasons, concern for the macro and micro-economic effects of 416 are warranted.

- embassies or USAIDs have a clear vision of how 416 commodities can fit

All of the countries studied have demonstrated, to a greater or lesser degree, this characteristic. Mexico's strategy was perhaps the most unorthodox and Peru's the most orthodox, with Chile and Tunisia somewhere in between. Future guidance cables should indicate the range of roles which 416 has played, including as the Tunisia report describes, the roles of "one-time instituitional booster, transition mechanism, and temporary assist." (page 2)

- embassy or USAID management oversight, consistent with a limited staff presence, can meet AID standards adequately

Countries where existing staff are unwilling or unable to invest sufficient time in the management of the 416 program should probably be excluded from consideration. Increased staff in Washington, improved methods of proposal review and approval, better methods of communication, and any other program modifications will ease the burden of local management, but it will remain significant.

Cooperating Sponsors

As the initial guidance cable states, the program relies on the cooperating sponsors for its success; the 416 program is most likely to succeed when:

- there exists one or more demonstrably competent cooperating sponsors in a country

While the Mexico program represents an example of where the 416 program contributed to the implantation of several new cooperating sponsors, by and large, the program relied upon cooperating sponsors already in existance. More importantly, these cooperating sponsors had already demonstrated their competence under different auspices before submitting proposals for 416 commodities.

- there exists coordination among cooperating sponsors in a given country

In the best of cases (Chile and Mexico), formal coordination increases the efficiency and effectiveness of the program. Further, by providing a contact point for the embassies or

USAIDs, such coordinating mechanisms can ease the management burden. Even where no formal coordinating mechanism exists (such as in the case of Tunisia), the informal coordination proved useful in resolving certain problems.

- cooperating sponsors limit their objectives

Because the range of cooperating sponsors and activities is so varied, it is difficult to prove this point; but the general tendency would seem to be that the development of specific activities around limited and well-defined objectives (such as in the case of FEMAP) is more successful than broad activities and general objectives (such as in the case of DESMI).

- cooperating sponsors have already developed acceptable management systems which do not require further investment

While this characteristic is obviously linked to the competence of the cooperating sponsor, the point here is that the 416 program should not necessitate any further expenditures for logistical or management support.

Project Proposals

In addition to being responsive to the legislation and regulations in effect, project proposals would seem to be strongest where:

- criteria exist for the selection and management of beneficiaries

All of the country studies indicated a concern for the establishment of beneficiary selection criteria, but there were significant differences in the conception of management tools (identification cards, service performance records, etc.) for these beneficiaries.

- different ration alternatives are presented based on various assumptions about commodity mix and quantities

More than establishing that proposed ration goals are nutritionally sound, proposals should offer evidence that other kinds and amounts of commodities can be incorporated into the program.

- a plan for phase-out or termination is contained in the proposal

With the exception of Peru, each of the country studies indicates thought about the graduation of beneficiaries (Chile) or at least the rotation of beneficiaries (Chile and Tunisia). Formal plans for phase-over were in effect for Tunisia and proposed for Chile. Both beneficiary-level and country-level contingency plans should be required.

REDUCTION OF PROGRAM RISKS

Recommendations for the reduction of program risks may be grouped around the issues of program fit, program management, and program orientations.

Program Fit

Based on the interrelationships between beneficiaries, organizations, and programs, consideration of future 416 projects should take into account that:

- 416 program commodities are temporary and must not be perceived as potentially longer term

Use of temporary 416 commodities to support permanent programs is inappropriate in most cases, although the Chile report argues that they can "be limited to provision of temporary incentives or intermittent donations intended to maintain coverage for short intervals." (page 28) No program depending excessively on the use and continued stable supply of specific commodities should be approved.

- cooperating sponsors should not be permitted to alter their normal program emphasis in order to acomodate 416 commodities

No organization not already involved in food distribution should be allowed to commence such activities with 416 commodities. Organizations already involved should be required to incorporate food into existing activities rather than being permitted to introduce new activities. Proposed increases in coverage must be accompanied by plans for maintaining such coverage after the termination of 416 commodities.

- cooperating sponsors must be capable of rapid accommodation to abrupt declines in commodity availability

Cooperating sponsors in their own approach to the use of 416 commodities must consider them as a windfall and not count on them for a particular population at a particular time.

- project objectives must avoid creating dependency on the part of the beneficiaries

Projects must emphasize food as a tool for change of attitudes and behavior and not simply as a response to need.

- project objectives must be commensurate with the limitations of the program

Unless certain conditions can be met, the inclusion of development objectives in 416 project proposals is probably

inappropriate. First, as the Chile report notes, "no steps should be taken to promote development impact of Section 416, until programming to feed needy people proceeds in orderly fashion and without delay." (page 28) Second, unless commodities can be guaranteed over some period of time, reasonable impact cannot be achieved. Similarly, the evidence suggests that 416 is an inappropriate response to certain kinds of emergencies. On the one hand, the program has responded poorly to natural disasters; on the other, the Mexico report argues that it "seems especially appropriate for compensating poor prople during short term economic emergencies." (page 107)

Program Management

Based on the management functions of planning, organizing, staffing, and directing and controlling, the different participants in the review, approval, and implementatic of the 416 program must remember that:

- some form of relevant fiscal year planning must be introduced

While the Chile report urges that "multi-year planning for Section 416 programs should be discouraged in the absence of multi-year commodity availability commitments," (page 28) planning will most certainly continue within the cooperating sponsors and should be linked to Washington decisions. Currently, the more sophisticated sponsors plan around 416 commodities, preferring to treat them as a windfall rather than a guaranteed resource. Less sophisticated sponsors will have less inclination and less latitude to plan accordingly. AID/W must take the initiative to introduce improvements in planning which will facilitate the task of the cooperating sponsors. The Mexico report suggests the 'conversion of the ineffective and long ad hoc project approval process into a single, rapid annual planning cycle." (page viii)

- regular information must provide the cooperating sponsors with the means to plan

Two important improvements are already underway within AID/FFP. First, a revised guidance cable updating the current 416 program situation is being prepared. Additional guidance will be needed once Regulation 10 is revised. Second, a quarterly system of signalling commodity availability has been agreed upon. This sequence of communications offers an opportunity to begin a dialogue with USAIDs and cooperating sponsors; such a dialogue should lead to improved thinking about the projects and eventually to improved planning on the part of the cooperating sponsors.

- regular communication must include the risks inherent in the program

While there can be no doubt that Washington communicated at every

opportunity the temporary nature of the program, the message was not really received. This suggests that the message was faulty and/or the messenger failed to communicate it. The Tunisia report tends to put the onus on the message: 'temporary is a highly familiar adjective in AID programming frequently subject to being revised to 'less temporary.'" (page 2) The Mexico report, by proposing the appointment of contact persons in the embassies/USAIDs and, especially, in Washington (page 120) indicates the need to improve the messengers. Communication of the risks of the program and especially of the termination of commodities requires a sensitivity which can only be acquired over time.

- alternatives to the present system of allocating commodities can be devised

A number of proposals for allocating commodities have been presented in the field studies, including:

- "First come, first served" basis (Chile, 9)

- Programming a guaranteed amount, if possible, while retaining contingent proposals for implementation when surplus commodities increase (Mexico, 116)

- Building a reserve of approved projects that are not time-specific or dependent on particular commodities (Pines, 4)

Other alternatives might be envisioned, but the last proposal seems the most feasible, in part because it ratifies certain already existing practices.

- the system of proposal review and approval must be improved

As a first step, political and technical considerations might possibly be separated, with political considerations being examined first. Technical consideration of a project proposal must involve a clear definition of the roles and responsibilities of the review participants, a review calendar with specific decision deadlines, and communication of the rules of the game to cooperating sponsors. As to the definition of roles and responsibilities, FFP has addressed part of the problem with its reorganization, but to the extent that techincal review is a multi-agency function, additional changes will be necessary. Similarly, FFP has instituted a system for tracking the progress of proposals. When this is fully operational, proposals will presumably no longer be delayed through inattention; on the other hand, analysis of the delays suggests that constant discussion and requests for information are the major part of the problem. Guidelines similar to those which exist for the steps after signature of the agreement would be useful for the steps prior to signature. Finally, communication of the results of the definition of roles and responsibilities and of the proposal

review steps would enable cooperating sponsors to understand where in the process their proposal is situated.

- the distinctive features of 416 program shipping need to be made clear to USAIDs and cooperating sponsors

Schedules for shipping must be realistically prepared and respected by all the parties signatory to the agreement. The agreement represents a contractual arrangement and should be considered as such, rather than as a general and easily amendable statement of intent.

- distribution of commidities to beneficiaries should respect the principle of equity

While this problem has not generally arisen, the Chile report (pages 22-23) raises the issue of commodity distribution in times of scarcity, and embassies and USAIDs should pay particular attention to the problem's implications.

- monitoring and evaluation systems should be reviewed and systematized

To date, no serious reporting of 416 results and problems is occurring, at least to the Washington level. Minimal information needs were defined but for various reasons (including their relevance and the lack of insistence from Washington), these needs were not respected. Given the range of cooperating sponsors and projects, there is a need to design reporting formats of different levels of sophistication for each of the different categories of project objectives. More on-site monitoring by AID/W and participation in evaluations would also be useful.

Program Orientations

Because of the multi-agency nature of the 416 program, agreement to proceed with any of the above recommendations will probably require fairly extensive negotiations. More importantly, given the experiences of past program history, a reorientation of attitudes and approaches will probably be needed. To this end, the various actors should consider that:

- currently there exist few incentives to improve the 416 program, and these incentives must be developed

Aside from angry reactions from the field or programmatic end runs by frustrated cooperating sponsors, 416 is relatively insulated from some of the pressures that other food programs are normally subjected to. Imposition of fiscal year constraints on commodity allocation has begun to impose some order, but the non-budgetary nature of the surpluses means that an important piece is missing. In addition, the alleged temporary nature of the commodities has thwarted planning efforts. If 416 is to increase its efficiency and effectiveness, the program must adopt

and adapt certain programming and budgeting practices, even if they are not strictly relevant to the implementation of the program.

- Washington must develop a greater sensitivity to the effects of its decisions on the field

Because of the dispersed nature of the decision-making and the subsequent distance of many of the actors from the consequences of their decisions, there exists a certain callousness in the consideration of project proposals. In fact, to a certain extent, when problems develop with a program or country, the reaction is to drop the program or country rather than seek to resolve the problems. The perception that the 416 program may not be worth all the trouble it causes may or may not be valid, but to the extent that the attitude persists, it blunts an appreciation for the political repercussions of decisions made and more importantly it ignores the very real consequences for beneficiary populations.

FINAL CONSIDERATIONS

By and large, the preceding recommendations have ignored the foreign policy implications of the 416 program. The thrust of the recommendations, however, points to the preference of certain countries, cooperating sponsors, and projects over others. Specifically, more advanced countries with a demonstrated ability to mobilize public and private sector resources are preferred over less developed countries with few potential resources and an almost total reliance on the public sector; more experienced and sophisticated cooperating sponsors (preferably coordinated in some fashion) are preferred over inexperienced and, sometimes more importantly, isolated PVOs; and projects with a duration between short-term emergencies and permanent program support are preferred over projects which require an immediate or a permanent response.

Strict application of these preferences would exclude most of Africa and some of the neediest countries of the LAC region; its implications are harder to predict for Asia/Near East, since the 416 program has not been heavily involved in this area.

These considerations suggest the need for a general reconsideration of the 416 program, balancing the technical considerations presented in this report with their political implications.

ANNEXES

1. Bibliography
2. Summary Data on Section 416 Commodities by Country

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A N G O L A

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
5/074	UNICEF	-7/17/85	2160.0						8/85

B O L I V I A

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
3010	FOOD FOR THE HUNGRY	4/14/83-5/24/83	54.4				17.0		5-9/83

B R A Z I L

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
3015	KNIGHTS OF MALTA	-7/15/83	54.4						7-9/83
4025/5025	G/G SEPLAN	-3/29/84	20000.0 30000.0						5-9/84 1/85
4043/ 5043/6043	AMERISHARES FOUND.	-6/22/84	12.5 12.5 37.5 12.5 25.0		25.0 25.0 75.0 25.0 50.0		12.5 12.5 37.5 12.5 25.0		7/84 10/84 1-7/85 10/85 1-4/86
6506	G/G SEAP	2/24/86-7/24/86	10000.0						8/86

B U R K I N A F A S O

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
5073	LEAGUE OF RED CROSS/ CRESCENT	-7/8/85	840.0						8/85

C H A D

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
5070	CARE	-7/1/85	1000.0						7/85
5071	LEAGUE OF RED CROSS/ CRESCENT	-7/1/85	1000.0						7/85

5

C H I L E - 1

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UMP	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
3002/4002	CARE	9/30/82-1/14/83	420.0				540.0		3-6/83
3003/4003	CRS	9/30/82-1/17/83	883.0				563.0		3/83
3004/4004	SAWS (ADRA)	-1/13/83	335.0				201.0		3/83
3013	G/G PNWC/MDH	3/21/83-6/17/83	4466.0 2234.0				224.0 111.0		6-9/83 12/83
4026/5026	G/G MDH-JUNAEB	3/25/83-3/26/84	2400.0 1200.0 3600.0						4-7/84 10/84 1/85
4036	CARE	12/6/83-5/8/84	1080.0		648.0		594.0		6-8/84
4037	CRS	12/12/83-5/24/84	1160.0				778.0		6-9/84
4038	SAWS (ADRA)	12/28/83-5/25/84	568.0		230.0		240.0		6-8/84
5026	G/G JUNAEB-MDH	-4/17/85	400.0						5/85
5037	CRS	1/24/85-6/18/85	909.0		491.0				7/85
5038	SAWS/ADRA	1/24/85-6/17/85	781.0		306.0				7-8/85
5042	G/G	-11/30/84	1080.0		450.0		450.0		11/84
	MDI AMEND 1	-5/31/85	2160.0		1440.0				7-9/85

C H I L E - 2

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	DHF	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	WHEAT	RICE	DELIVERY
5053	G/G MOH-PNAC	-1/3/85	6700.0				335.0				1-7/85
5063/6063	KNIGHTS OF MALTA	4/9/85-7/11/85	625.0 625.0 1250.0		500.0 500.0 1000.0						8/85 10/85 1-4/86
6088	CRS	11/85-5/27/86	606.0		324.0		376.0				5-9/86
6504	G/G MOH	1/86-4/7/86	5170.0				330.0				5-9/86
7603	G/G MOH-PNAC	8/86-6/29/87	2350.0 3600.0							9000.0	7-8/87
7704	ADRA (SAWS)	1/86-10/29/86	516.0		218.0						1/85 11/86
7713	ADRA	11/86-6/30/87	450.0		132.0		250.0		2047.0	936.0	7-8/87
7714	CRS	11/13/86-7/2/87	200.0		500.0				3151.0	2781.0	7-8/87

C O L U M B I A

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	DHF	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER			DELIVERY
3012	G/G ICBF (FAM. PLNG.)	3/15/83-6/10/83	950.0								7/83

C O S T A R I C A

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	DHF	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER			DELIVERY
6502	G/G	10/1/85-2/6/86	1200.0 400.0								2-7/86 10/86

DOMINICAN REPUBLIC

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	DRP	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
4035	G/G INESPRE	5/31/83-4/10/84	1114.0		1000.0			500.0	6-9/84
	AMEND 1	-2/20/85	557.0		500.0			250.0	12/84
	AMEND 2	3/27/85-11/27/85	400.0		566.0		200.0		12/85
6503	G/G INESPRE	12/26/85-4/1/86	3867.0						5-9/86

ECUADOR

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	DRP	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	WHEAT	DELIVERY
7604	G/G	2/25/86-7/30/87	1088.0						28200.0	7-8/87

E T H I O P I A

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	DHF	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	BULGUR WHEAT	DELIVERY
5058	WORLD VISION	10/31/84-11/30/84	3600.0				3600.0			1-9/85
5062	CRS	-1/9/85	5100.8				3239.0			1-2/85
	AMEND 1	-3/26/85	4673.0							4/85
	AMEND 2	-10/8/85	4449.0							11/85
5068	LUTHERAN WORLD FED.	-4/8/85	1840.0							4-5/85
5077	WVRO	-8/16/85	858.0							8/85
5078	SAVE THE CHILDREN	-7/31/85	573.0							9/85
			574.0							10/85
6084	CRS	-4/7/86	2527.0							5-7/86
6085	SAVE THE CHILDREN	-1/31/86	246.0							2/86
6089	CRS	-4/16/86							18340.0	5/86

G U A T E M A L A

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	DHF	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	WHEAT FLOUR	CORN	RICE	DELIVERY
3019/4019	CRS	5/5/83-8/5/83	5000.0									8-9/83
			5000.0									11/83
7707	SHARE	6/6/86-11/26/86	665.0		800.0		760.0		204.0	204.0	204.0	1-8/87
	AMEND 1	-6/10/87								141.0	141.0	9/87

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GUINEA

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
5051	G/G	6/84-12/13/84	1000.0						10/84
7600	G/G	4/19/86-10/16/86	1000.0				200.0		10/86

HAITI

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	BULGAR	WHEAT	SOY-BEANS	DELIVERY
3001	BLUE RIDGE CHRIST. HOMES	-1/3/83	54.4									1-9/83
4029	MT. VERNON BAPT. CHURCH	-3/8/84	42.1 19.8									4-7/84 10/84
4032	BRCH	-4/4/84	100.0 20.0 40.0				20.0					4-9/84 10/84 11-12/84
4035	INT. LIFELINE	-4/16/84	20.4 61.2									10/84 1-7/85
5032/6032	BRCH	-6/6/85	80.0 39.0 39.0		44.0		22.0					6-9/85 12/85 3/86
5046	FOOD FOR HUNGRY	-10/5/84	18.1 90.8									11/84 1/85-9/85
5067	MISSN. FOR CHRIST	-4/24/85	76.8 38.4 38.4		38.4 19.2 19.2		36.8 18.4 18.4					6-9/85 12/85 3/86
5076	INT. FELLOWSHIP HAVEN	2/85-7/29/85	60.0 60.0									8/85 12/85
6086	BRCH	-2/5/86	201.5 40.3		86.0 17.2		66.5 13.3					2-8/86 10/86
6092	BRCH FOR VARIOUS PROJ.	11/29/85-8/6/86	355.5		115.6		53.6		906.0	34.1		8-9/86
7718	CRS	9/24/86-8/5/87	75.0				25.0			262.0	52.0	9/87
7719	BRCH FOR VARIOUS PROJ.	-7/24/87	362.0				144.0			1154.0	206.0	9/87

INDIA

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSE CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
3017/4017	CRS	-7/20/83	2037.0 2035.0						8/83 12/83

INDONESIA

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
3011	G/G - BULOG	-6/13/83	3000.0						8-9/83

JAMAICA

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
5075/6075	G/G MIN YOUTH/CD	4/22/85-7/9/85		366.0 366.0 728.0					7-9/85 10-12/85 1-6/86
6507	G/G - PLNG INST	9/85-10/14/86	3000.0				550.0		9/86

LEBANON

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
7/708	AFRICSHARES	12/86-6/87	20.0						12/86

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M A U R I T A N I A

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
4030	G/G	11/7/83-4/16/84					2500.0		5-6/84
5056	LICHOS	-2/27/85	380.0				270.0		3/85
5064	G/G	11/8/84-2/22/85	2500.0				2500.0		3/85
	AMEND 1	3/26/85-5/8/85	2500.0				2500.0		5/85
6501	G/G	10/16/85-4/9/86	2500.0				2500.0		5/86

M E X I C O - 1

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
3005/4005	MCCA	12/29/82-1/20/83	16.3		8.2				1-7/83
			5.5		2.7				10/83
3006/4006	FOLB	12/15/82-2/3/83	272.2		72.6				1-9/83
			163.3		36.3				10-12/83
3007/4007	G/G	12/23/82-2/23/83	13000.0		1400.0	1400.0	3900.0		3-9/83
	DIF		7000.0		600.0	600.0	2560.0		10-12/83
3020/4020	CRS	7/6/83-8/23/83	673.5			45.0	225.0		7-9/83
			673.5			45.0	225.0		10-12/83
			2022.0			135.0	673.0		1-6/84
4034/5034	MCCA	12/29/83-4/19/84	10.8		5.4			1.0	6-7/84
			5.4		2.7			0.5	10/84
			5.4		2.7			0.5	1/85
4039/5039	SHARE	-5/9/84	23.0		53.2	38.1	4.4	7.6	6-9/84
			34.4		81.3	58.0	17.3	12.1	10-12/84
			86.4		202.7	144.8	49.2	29.0	1-5/85
	AMEND 1	-1/25/85	489.6		54.4	204.0			1-6/85
4041/5041	FOLB	1/10/84-6/18/84	660.0		220.0				7-9/84
			660.0		275.0				10-12/84
			1320.0		495.0				1-6/85
5034/6034	MCCA	12/4/84-6/17/85	13.6		7.0			1.4	6-9/85
			6.8		3.5			0.7	12/85
			6.8		3.5			0.7	3/86
5039/6039	SHARE	3/85-7/31/85	165.4	451.1	297.2	27.0	234.5	61.2	8-9/85
			222.9	457.2	400.7	33.9	305.1	81.6	10-12/85
			560.4	925.2	934.7	83.6	726.1	199.1	1-6/86

M E X I C O - 2

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	MILK	BUT	AG CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	RICE	COOP MEAL	DELIVERY
5041/6041	FOLR	3/85-6/5/85	660.0		165.0						7-9/85
			660.0		165.0						10-12/85
			1320.0		330.0						1-6/86
5045	G/G	4/15/84-8/29/84	7000.0		1740.0		2100.0				10-12/84
	DIF		13000.0		2460.0		4360.0				1-7/85
5049	CDA	-10/9/84	189.0		189.0		189.0				10-12/84
	DIF		567.0		567.0		567.0				1-9/85
5052	IPHD/DESMI	3/10/84-10/11/84	1575.0								12/84
			4725.0								2-8/85
6083	G/G	12/2/85-5/15/86	11000.0		5280.0		3760.0				5-9/86
	DIF										
6090	IPHD/DESMI	9/30/85-5/5/86	14727.0		1200.0		7200.0				1-6/84
											5-9/86
	AMEND 1	7/15/86-9/4/86							409.0	1023.0	9/86
6094	SMFB/FFMAP	4/15/86-9/15/86	48.0								9/86
7000	FOLR	2/5/86 -10/2/86	990.0		330.0						10-12/86
			2970.0		990.0						1-9/87
7701											
7703											
7705	SMFB	6/4/86 -11/4/86	96.0								11-12/86
			432.0								1-9/87
7710											
7712											
7716											
7717											

M E X I C O - 3

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	WHEAT	CORN	RICE	DELIVERY
7/701	CARE	-9/29/86	5400.0 9100.0		2200.0 4500.0					2200.0 4500.0		10/86 2-6/87
	AMEND 1		-4200.0									
7/703	DIF	8/27/86-3/30/87	10000.0		1500.0	1500.0	3000.0					5/87
	AMEND 1	-5/8/87								72.0		5/87
	AMEND 2	-6/10/87								17928.0		5/87
7/710	IPHD	9/9/86-4/16/87	427.0		665.0		704.0			19636.0	13418.0	5-9/87
	AMEND 1	-6/24/87	500.0									8/87
7/712	SMFB/FOLB	10/24/86-4/6/87	2640.0		880.0							4-9/87
7/715	SHARE	10/86-6/12/87	750.0		665.0		704.0			2646.0	2698.0	7-9/87
	AMEND 1	-6/26/87							6673.0			7-9/87
7/716	CDA	10/86-8/18/87							5717.0	2332.0	4000.0	8-9/87
7/717	MCCA	8/13/86-7/7/87	18.2		10.9		3.7					8/87

M O Z A M B I Q U E

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	WHEAT	DELIVERY
4024	G/G	-2/6/84	2850.0			500.0	850.0	1440.0		2-9/84
5057	G/G	-12/20/84	2850.0			500.0	850.0	1440.0		2-8/85
7601	G/G	8/14/85-11/25/86	1873.1 4408.2		367.5 735.0		457.8 916.0	1058.2 2116.4	882.1 1764.2	12/86 2-3/87

N I G E R

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	WHEAT	DELIVERY
5066	CARE	1/29/85-3/12/85	1890.0							4-5/85
5072	LEAGUE OF RED CROSS/CRESCENT	-7/8/85	640.0							8/85
5079	G/G	-7/24/85	5000.0							8/85

P A K I S T A N

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
3016/4016	CRS	-7/20/83	54.4 54.4				54.4 54.4		7, 83 12/83
6001	WFP	-10/10/85	3600.0						12/85

P A N A M A

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
3018/4018	G/G 1ST LADY	6/4/83 -7/29/83	680.0 440.0 343.0				0.0 100.0 82.0		8/83 10/83 1/84

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P E R U

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
3008	G/G MDH	12/14/8-3/29/83	17526.0				1752.0		3-7/83
4044	CARE	1/24/84-6/18/84	500.0		270.0				7/84
5069	G/G MDH	2/1/85-9/9/85	8500.0				1100.0		10/85
7605	G/G	5/7/87-8/14/87	5296.0				1470.0		9/87

P H I L I P P I N E S

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
3014	CAI	5/4/83-6/17/83	113.4						6/83
	AMEND 1	2/15/84-3/27/84	200.0						5/84
	AMEND 2	-11/15/84	250.0						12/84
4040	CRS	3/20/84-6/1/84	1000.0						7/84
		-6/21/85	350.0						7/85
5014/6014	CAI		375.0						10/85
			375.0						3/86

POLAND

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	MILK	BUT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
3009	WVRO	2/2/83 -4/25/83	600.0			600.0		600.0	5-9/83
4021	WVRO	-9/26/83	360.0			360.0	630.0	360.0	10-12/83
	AMEND 1	10/19/83-11/17/83	300.0			1060.0	1580.0	1060.0	1-4/84
	AMEND 2	2/27/84-4/4/84	220.0			260.0		260.0	5-9/84
4027	CRS	-3/2/84	7800.0					15600.0	4-7/84
4028	CARE	-3/5/84	3500.0			1000.0		14580.0	4-7/84
4031	FOOD FOR POLAND	-4/16/83	408.3 45.3						4-9/84 10/84
5050	WVRO	2/27/84-9/27/84	120.0 480.0		290.0 800.0	240.0 1440.0	150.0 1070.0	460.0 1220.0	10-12/84 1-9/85
5050/6050	WVRO	5/9/85-10/29/85			300.0 900.0		150.0 450.0	300.0 900.0	11/85 1-7/86
	AMEND 1	5/15/86-5/29/86			400.0		152.0	400.0	5-6/86
	AMEND 2	-6/10/86	500.0						6/86
5060	CRS	3/19/84-1/31/85	5800.0		13200.0				1-9/85
	AMEND 1	3/9/85-10/30/85			5850.0				11/85
	AMEND 2	-5/15/86	1000.0						5/86
	AMEND 3	-6/11/86	91.0						5/86
6093	AMERISHARES FOUNDATION	5/21/86-6/30/86	91.0						5/86

PORTUGAL

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
5047	G/G	6/8/84 -10/24/84	1200.0						10-12/84
	IASE		400.0						3/85
	AMEND 1	4/15/85-8/1/85	900.0						8/85
			450.0						11/85
			450.0						1/86
5048	INT. CHRIS. AID (ICD)	10/4/83-10/10/84	90.0		112.5		45.0		11/84
		6/20/84	270.0		337.5		135.0		2-8/85

SRI LANKA

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
4022	G/G MIN FIN/PLNG	7/19/83-2/2/84	2750.0						6/84
6505	G/G	4/26/86-8/29/86	750.0						8-9/86

SUDAN

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
5065	G/G	-3/7/85	6500.0						3-5/85
	AMEND 1	-5/8/85	1094.0						5/85
	AMEND 2	-8/9/85	1366.0						9/85

TANZANIA

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	BULGUR WHEAT	DELIVERY
4073	SALV. MISSION	9/10/83-11/11/83	150.0				70.3			11/83
			300.0				140.6			4-7/84
	AMEND 1	-4/17/84	100.0				40.0			4-7/84
5054	SALV. MISSION	-10/25/84	200.0		0.0		90.0			10/84
			400.0		18.0		180.0			6-9/85
5081/6081	SALV. MISSION	8/14/85-9/3/85	450.0				190.0			10-12/85
			200.0				80.0			4/86
5082	SALV. MISSION	8/14/85-10/3/85							450.0	11/85
									150.0	4/86
7702	SALV. MISSION	6/12/86-9/12/86	230.0				100.0		230.0	10/86
			420.0				170.0		420.0	1-6/87

TUNISIA

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	WHEAT	DELIVERY
6091	CRS	11/22/85-6/23/86	1680.0		816.0		347.0		6000.0	7-9/86
7706	CRS	7/28/86-10/29/86							57000.0	11-12/86

WEST INDIES

(Haiti, Jamaica, St. Lucia, Dominica, Grenada, Guyana)

AGREE	CO-OP SPONSOR	SUBMITTED /SIGNED	NFDM	UHT	AM CHEESE/ PROCESSED CHEESE	CHEDDAR CHEESE	BUTTER OIL	BUTTER	DELIVERY
7/720	FOOD FOR THE POOR	-7/15/87	2000.0						8-9/87