
USAID's Pesticide Procedures: Big Part of Regulation 216

Procedures for assessing and mitigating environmental and safety impacts on AID projects

Module Objective:

Trainees Know and Explain USAID's Environmental Regulations and Pesticide Procedures



Module Overview

- Reg 216 Basics: CE, IEE, TD, SS, EA, EIS
- The 12 parts of the Pesticide Procedures
- Study pesticides using systems thinking
- Critical issues beyond 216 that show risks
- Pesticide import, re-packaging & quality
- Pesticide safety, disposal & PPE
- Restricted Use Pesticides
- International pesticide restrictions/bans



Why follow Reg 216?

- Avoid harming people in host countries
- Avoid harming environment in host countries
- Avoid diplomatic problems
- Engenders public trust in USAID
- State-of-the-art best practices
- Allows USAID to exist
- *It is the law*



Environmental Damage



Who is Responsible? Everyone!



What Does 22 CFR 216 Say?

For every program, project, activity or amendment, *prior to funds obligation*

- Identify potential issues
- Assess environmental impacts
- Make design changes
- Implement mitigative measures
- Invite the public for consultation



Environmental Impacts

- Categorical Exclusion (CE): Projects without impacts (**rare**)
- Initial Environmental Examination (IEE): Projects with likely impacts
- Threshold Decision (TD) of IEE:
 - Positive—EA required
 - Negative *with Conditions*—EA not required



Environmental Damage



Serious Environmental Impact

- Scoping Statement (SS): Identify significant issues for EA study
- Environmental Assessment (EA): Projects with significant impacts

In very rare cases...

- Environmental Impact Statement (EIS): Program with cross-border issues (like marine pollution)



Special Reg 216 Issue: Pesticides

- Powerful nerve toxins that can kill people
- 1976 Killed 5 and Injured 2800 Pakistanis
- Each year kill or injure people in developing & developed countries
- Used in most agriculture and health activities
- Training & safety equipment can help
- IPM helps and is USAID Policy!



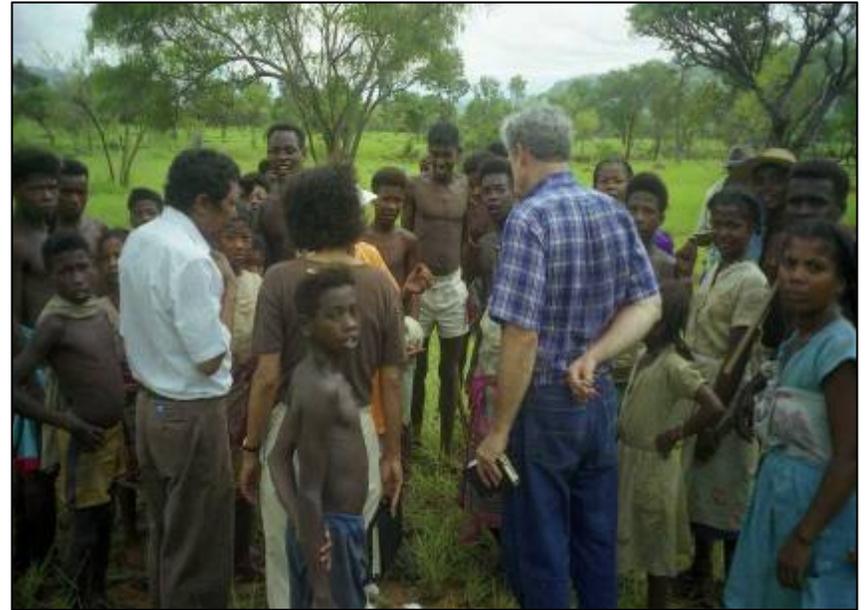
Why is this important to you?

- **RFP:** Write requirements for potential proposal winners to *understand* Reg 216's pesticide procedures, the 12 parts, & why each is important
- **Proposals:** See *evidence* of understanding of pesticide issues and impacts on human health & environment, and mitigation via GAPs/IPM measures
- **Environmental Assessments:** Request that an IEE/PERSUAP is budgeted & undertaken by project, *and be able to critique it*



Why is this important to you?

- **Monitoring:** In the field & In reports, be able to ask questions about the 12 parts of Reg 216-driven compliance
- **Markets:** Look for opportunities for market-driven compliance, like through GlobalGAP or Organic certification schemes



Regulation 216 requirements

“Every Pesticide Must Be Analyzed by 12 Critical issues”

The First 3 Issues

- Registration: USEPA
- Selection criteria
- IPM choices available



Regulation 216 requirements

The Next 3 Issues

- Application method & safety
- Acute and chronic health & environment
- Pesticide choice effectiveness



Regulation 216 requirements

The Next-to-Last 3 Issues

- Non-target organisms
- The use environment
- Availability of control alternatives



Regulation 216 requirements

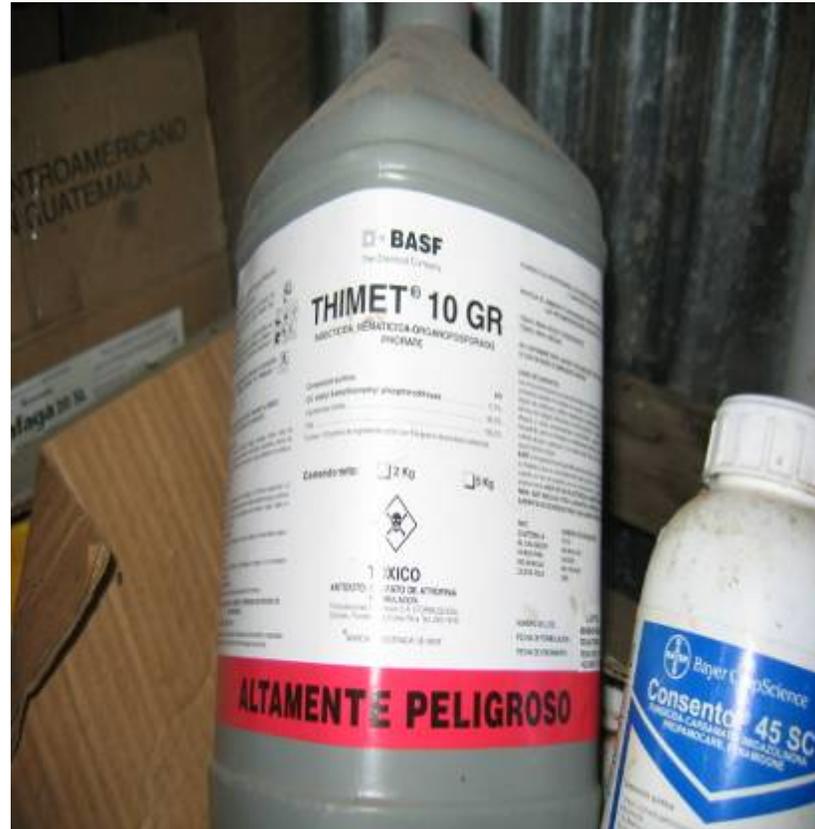
The Last 3 Issues

- Country pesticide management ability
- Provision for training
- Provision to monitor



Other Critical Issues

- Restricted versus General Use Pesticides
- Or, RUP vs GUP
- Export restrictions



Other Important Issues

- Small versus large holder
- Subsistence vs Cash crops
- Rainfed vs Irrigated



National Parks

- No Spray in Parks
- Use buffer zones
- Careful with endangered species



Other Important Issues

- Importation & Repackaging without label information
- Soil contamination
- Pesticide drift



Other Important Issues

- Import quality control—
active ingredient
- Adulteration & dilution
of pesticides
- Illegal importation



Other Important Issues

- Poor quality pesticide containers
- Poor quality labels that fall off or are in a foreign language
- Poor quality sprayers that leak



Other Important Issues

- Reuse of pesticide containers
- Storing or selling pesticides in soda bottles
- Labels without toxicity or first aid antidote information



Do you think that selling pesticides in soda bottle is rare?

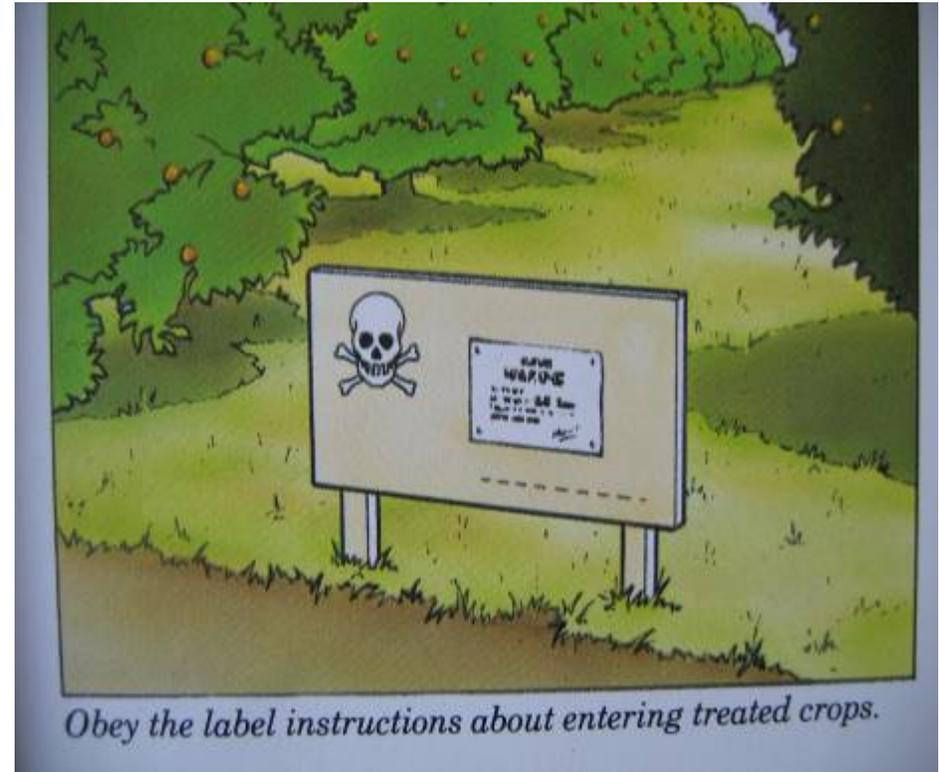
Pesticides *stored and sold* in soda bottles in Republic of Georgia:

- In Marneuli
- In Kutaisi



Monitoring & Residues

- Scheduled sprays without monitoring
- Restricted entry interval (REI)
- Preharvest interval (PHI)



Containers & First Aid

- Proper disposal of pesticide containers
- Farm first aid



Personal Protective Equipment

- Unavailability of personal protective equipment—PPE
- PPE too Expensive
- PPE too hot for tropics, subtropics



Beyond 216: International and US lists of pesticides that should **NOT** be used:

- PAN 'Dirty Dozen' List (actually 18)
- EPA 64 Banned/Severely Restricted Pesticides
- POPs (12 Persistent Organic Pollutants)*
- PIC 41 Prior Informed Consent Chemicals

*except DDT for malaria control with Indoor Residual Spraying



Reg 216 Also Requires

- Monitoring (by CTO and MEO) of all mitigation recommendations to ensure compliance
- IEEs and EAs amended over time as significant issues arise and things change
- Public hearings are held for inclusiveness & participation



Wrap Up: What you need to know

- Regulation 216 protects: host country people and environment & USAID
- Inappropriate pesticide packaging
- Inappropriate pesticide importation
- No spray: National Parks, Endangered Species
- Protect soil, water, biodiversity & food
- That there are bans on some pesticides
- Get training on safety & use of PPE



You should be able to:

- Write requirements for proposal winners to ***understand*** Reg 216's pesticide procedures, the 12 parts, & why each is important in RFP
- Recognize ***evidence in the Proposal*** of understanding of pesticide issues and impacts on human health & environment, and mitigation via GAPs/IPM measures
- Critique an IEE or Partner Monitoring Report for Regulation 216 pesticide procedures



What tool do we use to address all of these Reg 216 pesticide issues??

Hint: Starts and Ends with a “P”



Group Exercise

- Complete the short quiz
- Discuss results with team
- Discuss team findings with others

