



Initial Environmental Evaluations & PERSUAPs

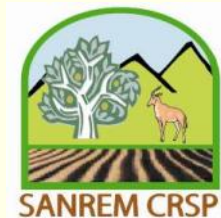
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The SANREM CRSP is made possible by the United States Agency for International Development and the generous support of the American people through Cooperative Agreement No. EPP-A-00-04-00013-00



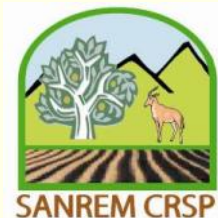
USAID
FROM THE AMERICAN PEOPLE

VirginiaTech
Invent the Future



History

- 1970: US passes world's 1st comprehensive environmental legislation
- 1974: USAID in Pakistan
 - Poorly trained field workers exposed to Malathion and died
- 1975: AID given choice:
 - Develop environmental procedures, or
 - Shut down



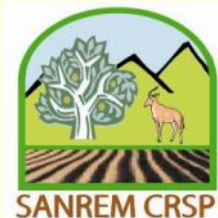
History

- Result:
 - Title 22, CFR 216
 - applies to all new & extended projects, programs or activities authorized or approved by A.I.D.
 - For projects including the **procurement or use** of pesticides, the procedures set forth in §216.3(b) will be followed.



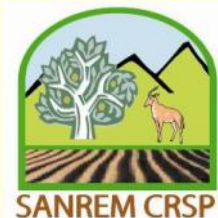
What is 22 CFR 216?

- Initial Environmental Evaluation (IEE)
- First review of the effects of an action on the environment
- Results in Threshold Decision:
 - Positive Determination
 - Environmental Assessment (EA) required
 - 3 mo – 1.5 yrs
 - Negative Determination
 - EA not required



Life after the IEE

- IEE completed by ME
 - Negative Determination by USAID
- Next step: PERSUAP
 - An amendment to the IEE
 - Pesticide: broadly defined
 - Do you want to procure or use a pesticide?
 - If so, you need to submit a PERSUAP



What's a PERSUAP?

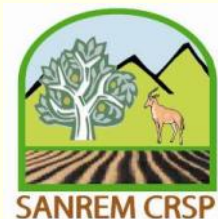
- PER:

- Pesticide Evaluation Report

- Introduction
 - Justification for pesticide use
 - Program description
 - Activities requiring pesticide use
 - Pesticide information
 - Complete for each pesticide

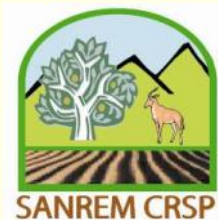


Complete
once



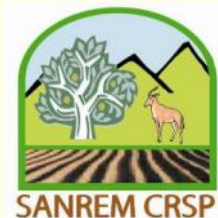
What's a PERSUAP?

- SUAP:
 - Safe Use Action Plan
 - Ensuring safe use
 - National pesticide regulation
- } Complete once



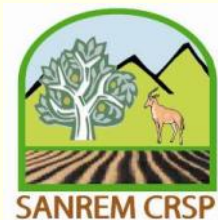
How do I complete a PERSUAP application?

- Examples available from the ME
 1. Read [Form 24](#) – PERSUAP Instructions
 2. Complete PERSUAP narrative as outlined in [Form 24A](#)
 3. Complete [Form 24B](#) – Pesticide Questionnaire for **every proposed pesticide**
 4. Submit documents to mulvamj@vt.edu



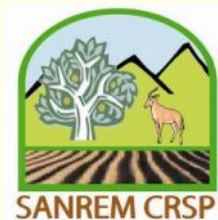
Form 24

- Instructions, not a form at all
- Defines “pesticide” broadly
- Explains:
 - Expected to be read & used by program personnel
 - Obligated to provide personal protection equipment (PPE)
 - RUP or Class I or II pesticides need strong justification
 - No pesticide use until PERSUAP approved



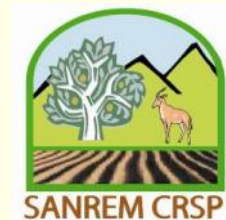
Form 24A

- PERSUAP Narrative
- Describes content of the PER & SUAP
- Let's look at [Form 24A](#)



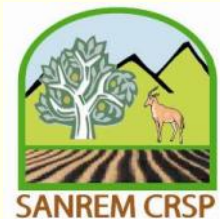
Form 24B

- Needed for every proposed pesticide
- Details exact info needed by USAID
- Let's look at [Form 24B](#)



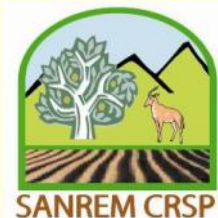
Example

- Philippines PERSUAP
 - Submitted on 29 April 2010



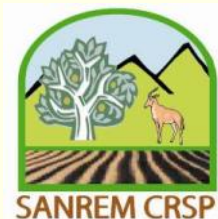
Exceptions?

- 216.3.b.2.iii provides exceptions, including:
 - “Projects including ... pesticides for research or limited field evaluation purposes by or under the supervision of project personnel.... Furthermore, treated crops will not be used for human or animal consumption unless appropriate tolerances have been established..., and the rates and frequency of application, together with the prescribed preharvest intervals, do not result in residues exceeding such tolerances.”



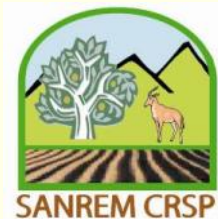
Exceptions?

- Practically speaking:
 - Research or education activities
 - Research or controlled experiments confined to small areas (under 4 ha or 10 acres) and carefully monitored
 - Analyses, studies, and workshops
 - Credit activities with no biophysical impact resulting from loans
- Most cases will not qualify for exceptions
 - Want to recommend findings to wider community



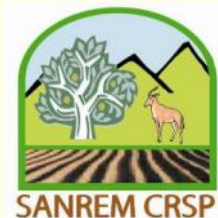
Who does what?

- PIs coordinate with host country partners to get info for PERSUAP
 - PERSUAP Narrative, Form 24A
 - PERSUAP Questionnaire, Form 24B
- PIs submit documents to ME
- ME will complete submission
 - ID human & environmental hazards
 - Hazard mitigation procedures
- ME will help!



Resources

- SANREM [website](#):
 - Research: Phase IV: [POP manual](#)
 - Environmental compliance section
 - Team room: SANREM PI forms:
 - [Form 24](#) – PERSUAP Instructions
 - [Form 24A](#) – PERSUAP Narrative
 - [Form 24B](#) – PERSUAP Questionnaire
- USAID website:
 - [§216.3 Procedures](#)
- Contact ME: mulvamj@vt.edu



SANREM CRSP

Shaping a sustainable future



Creating, organizing, and disseminating knowledge that improves livelihoods through sustainable agriculture and natural resource management

