



ANNEX E: TEMPLATE FOR CONSTRUCTION SUAP

SAFER USE ACTION PLAN

ACTIVITY DATA

Activity Name:	
Amendment (Y/N):	
Geographic Location(s) (Country/Region):	
Implementation Start/End:	
Solicitation/Contract/Award Number:	
Implementing Partner(s):	
Link of Other, Related Analyses:	USAID Global Construction PERSUAP: https://ecd.usaid.gov/document.php?doc_id=51716

ORGANIZATIONAL/ADMINISTRATIVE DATA

Implementing Operating Unit(s): (e.g. Mission or Bureau or Office)	
Funding Operating Unit(s): (e.g. Mission or Bureau or Office)	
Funding Account(s):	
Funding Amount:	
Amendment Funding Date:	Amendment Funding Amount:
Other Affected Unit(s):	
Lead BEO Bureau:	
Prepared by:	
Date Prepared:	

ENVIRONMENTAL COMPLIANCE REVIEW DATA

Analysis Type:	<input type="checkbox"/> Initial Environmental Examination <input type="checkbox"/> Amendment
Environmental Determination(s):	<input type="checkbox"/> Categorical Exclusion <input type="checkbox"/> Negative Determination <input type="checkbox"/> Positive Determination <input type="checkbox"/> Deferral
Initial Environmental Examination Expiration Date:	
Additional Analyses/Reporting Required:	
Climate Risks Rating for Risks Identified:	Low ____ Moderate ____ High ____

SUMMARY OF FINDINGS

PURPOSE AND SCOPE OF THE SAFER USE ACTION PLAN

[INSTRUCTIONS (TO BE DELETED ONCE COMPLETED): Provide a brief statement that this is a Safer Use Action Plan (SUAP) tiering off of the [USAID Global Construction PERSUAP](#) for (activity title) operating in the (region) of (country) from (start to end date). Specify which of the active ingredients analyzed in the Global Construction PERSUAP will be addressed in this SUAP.]

ACTIVITY SUMMARY

[INSTRUCTIONS (TO BE DELETED ONCE COMPLETED): Provide a brief summary of the activity. Concisely describe how this SUAP relates to any other RCEs/IEEs/EAs/PERSUAPs that cover this activity area for the mission or operating unit.]

ENVIRONMENTAL DETERMINATIONS

[INSTRUCTIONS (TO BE DELETED ONCE COMPLETED): Provide a summary of the environmental determinations applicable to the specific activities.]

Upon approval of this document, the determinations become affirmed, per Agency regulations (22 CFR 216).

IMPLEMENTATION

In accordance with 22 CFR 216 and Agency policy, the conditions and requirements of this document become mandatory upon approval.

USAID APPROVAL OF SAFER USE ACTION PLAN

ACTIVITY NAME:

Approval:	_____	_____
	USAID Bureau Director	Date
Clearance:	_____	_____
	Agreement Officer's Representative (AOR)	Date
Clearance:	_____	_____
	Mission Environmental Officer (MEO)*	Date
Clearance:	_____	_____
	Regional Environmental Advisor (REA)*	Date
Clearance:	_____	_____
	DCHA Climate Integration Lead (CIL)	Date
Concurrence:	_____	_____
	DCHA Bureau Environmental Officer (BEO)	Date

*Clearance recommended, but optional.



INTRODUCTION

This Construction Safer Use Action Plan (SUAP) contains an outline for country- or regionally-specific information that tiers off of the USAID Global Construction PERSUAP.¹ A project-specific Construction SUAP must be submitted by IPs for each project or set of related projects that require termite and/or rodent control as part of USAID construction activities. This SUAP may not modify the termiticide or rodenticide AIs that have been advanced for approval in the Global Construction PERSUAP nor may it circumvent the safety measures presented in this Global Construction PERSUAP.

Since this Global Construction PERSUAP applies globally to USAID projects, this SUAP is intended to enhance the knowledge base provided by this Global Construction PERSUAP by providing country- or regionally-specific information for USAID projects. Note that the term “regionally” is defined broadly to mean that it pertains to a portion of a country, such as a county, or to a single building site or multiple building sites within a country. The rationale for differentiating between “country” and “region” is that AIs may not be uniformly available across an entire country and thus, multiple Construction SUAPs might be required to cover multiple projects within a particular country. Conversely, if the AIs are uniformly available throughout the country in question a single country-wide Construction SUAP to this Global Construction PERSUAP may be a feasible approach.

Only products containing the AIs in Table I may be used for termite and rodent control as part of USAID construction and maintenance projects. The AIs in Table I are generally widely available, of reasonable cost, effective for termite or rodent control (acetamiprid must be formulated with bifenthrin for sufficient efficacy).

TABLE I. LIST OF USAID APPROVED PESTICIDES FOR TERMITE AND RODENT CONTROL IN VERTICAL BUILD CONSTRUCTION

ACTIVE INGREDIENT	ACUTE TOXICITY CATEGORY ²	RUP ³	APPROVED PESTICIDE?
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¹ Full Global Construction PERSUAP: https://ecd.usaid.gov/document.php?doc_id=51716

² Classifications and categories are for Technical Grade pesticide. Formulated products are often of lesser acute toxicity. WHO assigns a single classification (The WHO Recommended Classification of Pesticides by Hazard and Guidelines to Classification, 2009. World Health Organization, 2010. Available on the Internet at: http://www.who.int/ipcs/publications/pesticides_hazard_2009.pdf). EPA has several toxicity categories for various routes of exposure. Only the most stringent EPA category is given here. EPA categories come from REDs, Pesticide Summaries, Facts Sheets, and Registration Review Documentation. See Annex II for documentation of WHO and EPA Classifications/Categories and Annex II for a complete listing of EPA toxicity categories for pesticides for which USAID is being requested.

³ RUP status obtained from USEPA documentation (e.g., REDs, Summary documents, etc. and the January 19, 2016 RUP Report: <https://www.epa.gov/sites/production/files/2016-02/documents/rupreport-sec3-update-jan2016.pdf>) where available. Other sources include: Rhode Island Department of Environmental Management. No date. Federally Restricted and State-Limited Use Pesticides. Available on the Internet at: <http://www.dem.ri.gov/programs/bnates/agricult/pdf/frup.pdf> University of Florida (U.S.) IFAS Extension. 2009. Restricted Use Pesticides, available on the Internet at: <http://edis.ifas.ufl.edu/pi073> University of Nebraska. 2003. Federally Registered Restricted Use Pesticides. (U.S.), available on the Internet at: <http://www.ag.ndsu.nodak.edu/aginfo/pesticid/pdf/ec2500.pdf>

TABLE I. LIST OF USAID APPROVED PESTICIDES FOR TERMITE AND RODENT CONTROL IN VERTICAL BUILD CONSTRUCTION

ACTIVE INGREDIENT	ACUTE TOXICITY CATEGORY ²	RUP? ³	APPROVED PESTICIDE?
Termiticides			
Acetamiprid	WHO: Not listed EPA: II	No	Yes; but only in products that are co-formulations with bifenthrin
Bifenthrin	WHO: II EPA: II	Some RUPs	Yes
Cypermethrin	WHO: II EPA: II	All agricultural formulations; some termiticides	Yes
Deltamethrin	WHO: II EPA: II	Emulsifiable concentrate is RUP on cotton only	Yes
Disodium octaborate*; disodium octaborate, tetrahydrate	WHO: III EPA: III	No	Yes; but limited to products named as disodium octaborate; disodium octaborate, tetrahydrate; boron sodium oxide; or boron sodium oxide, tetrahydrate. Do not use anhydrous borax (sodium borate) or any other borates.
Fipronil	WHO: II EPA: II	Some RUPs	Yes
Imidacloprid	WHO: II EPA: "moderate" is most stringent	No	Yes; but not adjacent to flowering vegetation or when honey bees are foraging
Permethrin	WHO: II EPA: III	Not RUP for termite control	Yes

TABLE I. LIST OF USAID APPROVED PESTICIDES FOR TERMITE AND RODENT CONTROL IN VERTICAL BUILD CONSTRUCTION

ACTIVE INGREDIENT	ACUTE TOXICITY CATEGORY ²	RUP? ³	APPROVED PESTICIDE?
Rodenticide			
Diphacinone	WHO: Ia EPA: I	Some RUPs	<p>Yes; but only in tamper-resistant pre-baited traps and within 50 feet (general public) or 100 feet (trained, certified professionals) of existing structures. Only products labeled for outdoor use may be deployed outdoors.</p> <p>Do not use diphacinone sodium salt as this is not formulated for bait traps.</p>

TEMPLATE FOR CONSTRUCTION SUAP

Instructions: IPs are required to respond to all questions or statements indicated by **yellow highlights** below, as well as attach additional supporting evidence as indicated. The USAID Bureau Environmental Officer (BEO) needs to approve of the Construction SUAP before IPs may use or promote pesticides in USAID activities.

SECTION 1.0 BACKGROUND

Name of the implementing partner	
Award Number	
GPS Coordinates of the Implementation site	
This Construction SUAP is for:	<input type="checkbox"/> Termite control <input type="checkbox"/> Rodent control

SECTION 2.0 LOCATION DETAILS

Below, IPs are expected to provide an itemization of the locations where termiticides and/or rodenticides are to be applied.

For termiticides, include the following:

- Foundation footprint dimensions for new construction: **_____**
- Foundation type (wood post with crawl space; wood frame on grade; slab on grade, etc.): **_____**
- Specific soil types that are located at the sites where pesticide application or use will occur. Critical information includes not just soil types, but any related information such as porosity, degree of water saturation, ability to drain, how they are affected by temperature extremes and/or drought and soil stability (e.g., resistance to erosion). Note that in urban areas, “urban fill,” which tends to be of very high porosity due to the presence of larger pieces of broken construction material and cobbles, may be present. Include all that is known about the nature of the soils at the proposed sites of application of termiticides. **_____**
- Drawn plans for proposed new construction or existing site plans for existing structures. All plans must indicate the locations where termiticides are to be used. **Attach.**

For the rodenticide, include the following:

- Representative site/structure plans and proposed locations of bait trap deployment. **Attach.**

SECTION 3.0 SPECIFIC ENVIRONMENTAL AND CLIMATE CONDITIONS

Below, IPs are expected to provide additional environmental and climate information where termiticides and/or rodenticides are to be applied.

- Identify the major ecological zones (e.g., coastal plains, tropical forests, savannahs), including major geological features (e.g., mountain ranges, plateaus, major river valleys, etc.) near the implementation sites. **_____**

- Provide precipitation data, including annual trends, when rainy seasons exist and typical humidity levels. [REDACTED]
- Provide temperature data, including high and low and periods when/if ground freezing typically occurs. [REDACTED]
- Describe projections on how climate change may affect temperature and precipitation in the coming years and any known effects on termite or rodent activity/damage related to these changes. [REDACTED]

For termiticides only, also include the following:

- Identify the local hydrogeological characteristics, including typical depths to ground water and ground water flow direction(s) at the termiticide application site, the proximity and nature of any surface water bodies, the proximity of any wetlands. [REDACTED]
- The location and construction details (e.g., screening depth, is well cased on uncased? etc.) of any potable water wells within 450 meters (~1,500 feet) of the site of termiticide applications to soil. [REDACTED]

SECTION 3.0 PESTICIDE PRODUCTS AND HOST COUNTRY REGULATIONS

IPs must document that adequate and sustainable supply-lines of specific formulated products that contain only the AIs approved in the Global Construction PERSUAP have been established. The available products must be from registered manufacturers and/or distributors and must not be counterfeits of registered products. Formulated products must be licensed in-country for termite or rodent control.

- Commercial name of product(s): [REDACTED]
- Manufacturer information (name, address, telephone numbers, website, etc.): [REDACTED]
- Distributor information: (name, address, telephone numbers, website, etc.): [REDACTED]
- Active Ingredient(s), including formulation and concentration: [REDACTED]
- Provide evidence that the formulated product(s) are currently licensed in-country for termite or rodent control. **Attach.**
- Provide evidence that the manufacturer and/or distributor are currently licensed in-country. **Attach.**

In addition to the above, IPs must include an itemization (i.e., identify each relevant regulation by name and number and link it to what process or processes it controls) and description of host country regulations regarding distribution, storage, use and disposal of the AIs that are approved in this Global Construction PERSUAP. The Construction SUAP must further identify the regulatory bodies that are responsible for regulating these processes. [REDACTED]

SECTION 4.0 IPM PLAN

Using the information provided in the Global Construction PERSUAP, IPs are to develop their own site-specific integrated pest management (IPM) plans.

Complete table below.

INTEGRATED PEST MANAGEMENT PLAN

PEST TYPE: (Example: Termite Control)

DESCRIBE MONITORING METHOD: (Example: Monthly Inspections on Perimeter of Building)

NON-CHEMICAL PREVENTATIVE MEASURE:	NON-CHEMICAL CONTROL MEASURE:	CHEMICAL TREATMENT (INCLUDING PRODUCT AND AI INFORMATION)	THRESHOLD OR TIMING OF CHEMICAL TREATMENT
(Example: Fix Leaking Pipes)	(Example: Destroy Mounds with Hot Water)	(Example: Termidor SC with Fipronil at 9.1%)	(Example: Once When Laying the Foundation of Building)

SECTION 5.0 PROPOSED METHOD OF APPLICATION, INCLUDING SAFETY EQUIPMENT

Allowed methods of pesticide application are presented in Section 3.4 of the Global Construction PERSUAP. This section must include a statement as to the proposed methods of application. Depending on the type of application being performed and the AIs being used, the following Personal Protective Equipment (PPE) is required (see Table 2 in Section 3.4 of the Global Construction PERSUAP for specifics):

- Baseline PPE of long-sleeved shirts, long pants, shoes and socks is required for all pesticide applications or deployments; and
- Chemical-resistant gloves, chemical-resistant boots, eye protection and the equivalent of a Mine Safety and Health Administration (MSHA)/National Institute of Occupational Safety and Health (NIOSH) respirator are required as detailed in this Global Construction PERSUAP.

IPs must describe the method(s) of application. [REDACTED]

IPs must document the types of application equipment and PPE, as listed above, which are available in the host country or region, including vendors, locations and cost. IPs must document that adequate and sustainable supply-lines of reliable and durable PPE have been established. [REDACTED]

SECTION 6.0 TRAINING OF USERS AND APPLICATORS

User and applicator information (name, address, telephone numbers, website, etc.): [REDACTED]

IPs must provide information on how professional pesticide mixers and applicators are trained in the country or region and details regarding the process of certifying and maintaining certification of professional pesticide mixers and applicators, including training curriculum, trainer's experience and academic standing (e.g., academic degrees awarded), and frequency of training and certification renewal. [REDACTED]

Section 3.11 of the Global Construction PERSUAP contains the minimum training and certification requirements. The Construction SUAP must document that the certification and training meet these requirements.

Also, identify the regulatory body that is responsible for the certification and training of pesticide mixers and applicators. [REDACTED]

SECTION 7.0 ROLES AND RESPONSIBILITIES

Responsibility for safer pesticide use under USAID lies with the IP. Construction SUAPs tiering off of this Global Construction PERSUAP must identify the staff members and partners who will ensure that pesticide procurement and use is conducted in accordance with the requirements of this Global Construction PERSUAP.

This includes the staff members and partners responsible for critical monitoring activities as follows:

- Monitoring the effectiveness of education to evaluate whether the proper information and instruction is promoting the safe handling of pesticides;
- Monitoring pesticide transport, packaging, storage and formulation;
- Documentation of adherence to pest management procedures, including worker health, local resident health, non-target organism, ecosystem, and natural resources health and vitality, efficacy on application areas for target pests, proper maintenance of pesticide containers and left-over product;
- Monitoring and review of any documentation of any adverse effects to human health or ecological receptors due to termiticide or rodenticide use, including frequency and severity;
- Monitoring of new construction sites for pest levels and natural predators; and
- Monitoring for pest resistance and rotating pesticide use as needed.

Identify and provide contact information for the staff members and partners, including any specific roles and responsibilities, who will oversee the activities described above:

INFORMATION REQUIRED FOR SECTION 8.0 MATERIAL SAFETY DATA SHEET

The Pesticide Data Sheets (PDS) in the Global Construction PERSUAP were prepared, as a necessity, at the AI level. Each Construction SUAP tiering off of this Global Construction PERSUAP must contain a Material Safety Data Sheet or pesticide label each formulated product, containing only the AIs approved in the Global Construction PERSUAP being proposed for use under the subject Construction SUAP. Only products registered for use as termiticides or rodenticides may be used, and they must be selected only from the AIs that are approved in the Global Construction PERSUAP.