

# Blunt Instrument

The United States' punitive fumigation program in Colombia

**The Latin America Working Group** is a coalition of over sixty nongovernmental, religious, grassroots and development organizations dedicated to education and advocacy for US policies that promote human rights, peace, and sustainable development.

The United States is using a controversial method in Colombia to eradicate spiraling coca and poppy production. Unlike in other countries, the primary tool is an aerial fumigation program in which an herbicide is sprayed over fields from crop-dusting planes. The broad-spectrum herbicide kills both drug crops and food crops.

When the Clinton Administration presented a \$1.3 billion aid package to the US Congress for 2000-01, the first installment of a massive increase in annual aid to Colombia and other Andean countries, it billed its program as a "balanced package." The administration stressed that the aid included alternative development programs for small farmers to

help them transition to legal crops, with fumigation as a necessary enforcement tool. Concerned about maintaining a "balanced package," as well as about the impact of fumigation on farmers innocent of drug production and the unresolved questions about the impact of fumigation on health and the environment, the Congress included a set of conditions governing the fumigation program in the FY2002 foreign aid appropriations bill. The conditions require the State Department to consult with the Environmental Protection Agency regarding the health and environmental impact of fumigation and to report on mechanisms for compensation for legal crops sprayed and damage to human health. The conditions also require that alternative development programs be carried out in the areas subject to fumigation.

The State Department's Bureau for International Narcotics and Law Enforcement, after some delay, released the report to Congress in September 2002. The following is an analysis of the compensation and alternative development provisions included in the report. While these provisions do not cover all of the issues raised by the spraying program—not the least of which is the question of effectiveness on reducing drug production regionwide—they provide a window through which to gauge the human impact. What they reveal is a combination of US-sponsored policies that are strikingly inhumane.



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## Executive Summary

The conditions attached to the FY2002 foreign operations law governing the US-funded aerial spraying program to eradicate coca production in Colombia require that procedures be available to evaluate claims by local citizens that their health was harmed or their legal crops were damaged by aerial fumigation, and that fair compensation be paid to valid claims. According to the State Department's report released in September 2002, entitled "Report on Issues Related to the Aerial Eradication of Illicit Coca in Colombia," while a procedure for verification exists, not a single farmer has received compensation, and only one case has so far been approved for compensation. The compensation system for legal crops exists on paper, but not in practice. The report details no such procedure for evaluating health claims. Citizens' only recourse is their right to take legal action against Colombian government agencies.

The conditions also require that alternative development be developed in departments scheduled for fumigation and implemented in departments where fumigation has taken place. The State Department report interprets this provision to mean a single alternative development project in a given geographic department (i.e., province or state) of Colombia satisfies the requirement, permitting fumigation to take place anywhere in that department. Thus the report did not provide a serious treatment of this provision. The fact that in 2002, USAID claims to have supported only 4500 hectares of licit crops while in the same year, the US Embassy goal is to spray 150,000 hectares, is one of several rough comparisons that reveal that the aerial fumigation program far outpaces alternative development. Indeed, alternative development programs are only designed to cover a small subset of the farmers affected by fumigation.

## I. Compliance with Compensation Provision

The conditions on the aerial spraying program attached to the FY2002 foreign operations appropriations bill require "that procedures are available to evaluate claims of local citizens that their health was harmed or their licit crops were damaged by such aerial coca fumigation, and to provide fair compensation for meritorious claims." While in its September 2002 "Report on Issues Related to the Aerial Eradication of Illicit Coca in Colombia," the State Department's summary findings conclude such procedures exist, the process for claims for legal crops sprayed exists on paper but not in practice. Not even a paper procedure exists for health claims—citizens' only recourse is to go to court.

### A. Procedures for claims for legal crops sprayed

The State Department report asserts that, "The Government of Colombia has long had a process under which Colombian citizens could seek compensation for claims of harm to legal crops or human health." On October 4, 2001, the "GOC formally instituted a new process for compensation for legal crops sprayed in error. The GOC directs the process with funds provided by the United States Government."

Complaints go to municipal representatives known as "personeros," who refer them to the agricultural agency for a field visit. After the field visit, the personero will submit the complaint and a record of preliminary verification to the Antinarcotics Police and the National Directorate of Dangerous Drugs (DNE). Within five days, the Antinarcotics Police is supposed to certify whether or not it took place in an area subject to spraying.

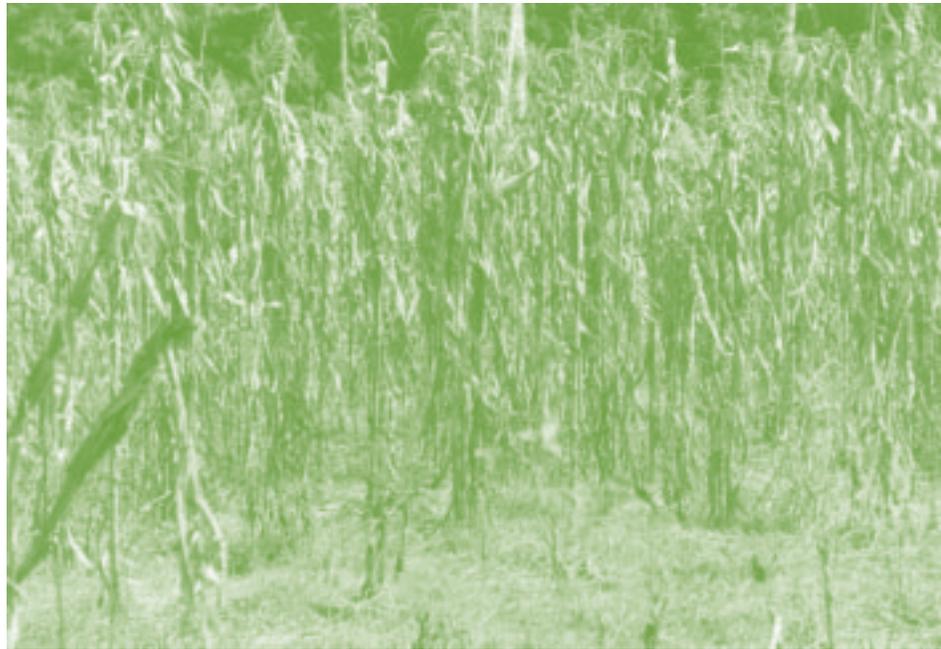
By August 2002, according to the State Department report, the DNE had received over 1,000 complaints through this new process. Of these, close to 800 were dismissed "after further investigation showed that spraying did not take place in the complainant's vicinity during the date



of the complaint.” Some 220 complaints were deemed to require verification, but only 14 have been verified, and in only one case did the DNE agree to pay damages, and those damages have not yet been paid.

The official result of the compensation process therefore is that not a single case has resulted in compensation to date and only one out of 1,000 complaints is scheduled to receive compensation.

The first question raised by these statistics is, Is it possible that 800 out of 1,000 claims are coming from areas not fumigated? To file a claim, a small farmer has to travel into town, usually in a risky security situation, wait in the personero’s office, and subject himself to a field visit by government agents. Given the risks involved, what could account for this flood of complaints from areas allegedly not sprayed? It seems highly probable that many of these claims are indeed coming from fumigated areas, and were improperly rejected without verification. According to the Colombian Government’s own ombudsman agency, the Defensoría del Pueblo, the DNE rejects complaints in which the complainant cannot specify the exact



location of his farm according to terms accepted by the DNE, and yet the personeros who register claims have not received the maps and forms necessary to file proper claims nor do most receive any training to do so. Moreover, the areas the DNE declares fumigated may not acknowledge the areas of spray drift, which could account for a substantial amount of food crops fumigated.

accounts for some, but is not likely to account for all cases not verified. In its May 2002 amicus brief in support of the indigenous organization OPIAC’s case regarding fumigation, the Colombian government’s Ombudsman’s Office noted that in the cases it follows, it has never observed a single field visit actually taking place despite the October 2001

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The second question is, Why are so few of the claims actually investigated? The difficult security situation definitely

resolution regarding a new complaint process. If security precludes police investigation of cases, the Colombian government should set up an alternative process involving local community leaders in the verification process.

The final question is, Do the 1,000 claims represent the full universe of cases? The Colombian government’s Ombudsman’s Office asserted that this office alone had received a total of 6,553 claims.<sup>1</sup> According to the Ombudsman’s Office,



claims pour into diverse authorities, including the Ombudsman's Office, the personeros, the police and the DNE.

One inherent contradiction in the compensation program is that the agency charged with investigating complaints, the

indicates the fumigation program is not nearly as accurate as claimed. For example, the Colombian government's Ombudsman's Office asserts there is "[such] a lack of coordination between alternative development projects with the chemical aerial fumigation program... that

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antinarotics police, is the same agency charged with implementing the aerial spraying program.

In sum, the claims process is, as the Ombudsman's Office declares rather charitably, "inadequate and ineffective."<sup>2</sup>

#### **B. Available information regarding legal crops sprayed**

There is substantial anecdotal information regarding cases of legal crops sprayed that

some of the alternative development projects have been subject to fumigation."<sup>3</sup> The Ombudsman's Office cites the Colombian government-funded project in the Indigenous Reserve of Aponte; the German government-funded project in Bota Cauca in 2000, and various projects funded by the Colombian national and municipal governments and the United Nations in Valle de Guamez, San Miguel and Orito in Putumayo at the end of 2000 and the beginning of 2001.<sup>4</sup>

**August-September 2002 fumigation.** In the August-September round of fumigation, USAID-funded alternative development projects have been sprayed, including communities that claim 100% eradication; also sprayed was at least one area where there had never been illicit crops, according to the Ombudsman's Office. Among the alternative development projects hit was the much-heralded palmito project, in which local palmito harvests feed into Putumayo's brand-new, government-funded palmito processing plant. Some 34 farmers growing palmito as part of the alternative development project were affected, for an estimated damage of \$42 million pesos.<sup>5</sup> Indigenous leaders and the NGO Vida y Futuro reported that four communities of Orito and three of Puerto Caicedo were fumigated, including some claiming 100% eradication. News reports cited families fleeing into towns, neighboring municipalities and Ecuador. The National Ombudsman of Colombia, Eduardo Cifuentes, stated, "A chaotic social situation is developing and we hope that the governments of Colombia and the United States are taking note of it."<sup>6</sup>

A statement from the indigenous association OZIP asserted that indigenous communities had confirmed their geographic coordinates (to plug into the GPS system used by the fumigation program) in July 2002 with the Colombian government's alternative development agency, PLANTE, to make sure they were excluded from fumigation, but were sprayed anyway. When they went to PLANTE to complain, PLANTE said fumigation is in the hands of the police; when they went to the police, the police said PLANTE had never given them the coordinates.<sup>7</sup> Putumayo small farmers' association leader Eder Sanchez claimed that this round of fumigation "was one of the most extensive and indiscriminate so far."<sup>8</sup>

**The November 2001 spraying campaign & fumigation of the social pacts.** As documented by the Ombudsman's Office

and by various news articles, small farmers, including in indigenous communities, who had signed social eradication pacts, had both coca and legal crops, including new alternative development projects, sprayed in November 2001 in Putumayo.<sup>9</sup> These social pacts, signed by the communities with the Colombian government, allowed farmers one year to eradicate illicit crops. The Colombian government for its part pledged to provide specific aid. The November 2001 sprayings took place in the middle of the pact year, in many cases before much alternative development aid of any kind had been delivered. "They broke their promise. They said they wouldn't spray if we joined...." lamented a farmer interviewed in a Reuters story.<sup>10</sup> According to the Ombudsman's Office, only 3.45% of the promised aid had arrived by October 2001.<sup>11</sup> The State Department asserts that their aerial photographs showed new coca crops planted, making the pacts invalid, but did not accept any responsibility for the failure to deliver aid. The small farmers believed their signed agreements with the Colombian government guaranteed them aid and gave them a year to eradicate. Thus small





farmers were left caught in the middle of a major unresolved policy dispute between the Colombian and US governments.

Spraying resumed again recently when the one-year pacts had run their course, but a substantial amount of the promised aid

pacts.... The pacts textually state that the year begins once the aid actually begins to be delivered.” The letter states that by March 2002, only 21% of the aid for food security projects had been delivered, and only 24% of the 37,775 signers of the social pacts had received full or partial

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was never delivered. Again, there are differences between the US government and local and regional Colombian government authorities regarding whether these farmers should be protected from spraying because the Colombian and US governments failed to fully deliver promised aid. The Colombian government Ombudsman’s Office in a July 22<sup>nd</sup> letter to the Minister of Justice asserted that “the date of July [2002] cited by the government as ending the term [of the pacts] does not match either the actual date that they began nor what is agreed to in the

delivery of promised aid. (The social pacts read: The signer agrees “to eradicate manually and voluntarily 100% of illicit crops within one year, starting from the first disbursement for the food security project.”)

In an interview with the Ombudsman’s Office in February 2002, a member of the environmental team remarked to LAWG staff, “We do verification of some of the cases. We certainly have verified small farmers sprayed who have no coca. For example, evangelical families who have a religious belief against growing coca. Yet

we have not observed a single case of compensation being granted. Even a case in which a fumigation tank was dropped accidentally on a farm, and an internal police report documented it. They might pay that one, but nothing so far.” In February and May 2002, LAWG heard individual reports from a number of farmers from Putumayo, Nariño and Cauca who argued that they had solely legal crops, that they filed a report, but that nothing had come of it. In an interview with LAWG in February 2002, the Governor of Nariño, Parmenio Cuellar, stated that there had not been a single case of compensation in Nariño province, including the case of an agricultural school which had been sprayed.

Certainly a number of complaints of food crops sprayed are from farmers who are growing both legal and illegal crops, and who are not included in a social pact. While the loss of their food crops is a humanitarian problem, their claims for compensation would not be considered legitimate.

Yet the complaints filed may also be only a portion of the actual cases. According to the Ombudsman’s Office, some people are afraid to file complaints, fearing that even if they have no illicit crops themselves, they will be arrested for failing to denounce their neighbors’ crops. LAWG heard from regional governmental staff and farmers in February 2002 that the number of complaints are starting to decline because there are absolutely no results from the compensation process.

In conclusion, the compensation program exists on paper, but not in practice.

### Procedures for health claims

Regarding health claims, according to the State Department report, no similar mechanism for filing claims for health impact exists. Citizens must go to court; they may file claims by taking “the legal action known as ‘tutela’ or by a direct action against the appropriate Government



of Colombia entity.” Many citizens are in fact bringing their health claims to the attention of the personeros and to local governmental health agencies, hospitals and clinics, but no official process exists to process and verify these claims. According to the Colombian Comptroller General’s office, of 800 complaints presented to the personero of La Hormiga, Putumayo, concerning fumigation, 73% included claims of impact on health.<sup>12</sup> In some cases, concerned local governmental authorities, including the health agency DASALUD, have undertaken their own attempts to collect and verify information, but this is not supported at a national level.

The bulk of the State Department assessment on compensation of health claims is devoted to discounting health impact. An analysis of a handful of the most extreme claims for health damage is included, as is description of US embassy teams sent to investigate such claims, but this does not constitute an official governmental process for reviewing claims.

It is telling that after the State Department had for years discounted any



possible impact on health with repeated statements that glyphosate is as harmless as “baby shampoo,” the Environmental Protection Agency’s analysis included in the State Department’s report concludes that the fumigation mixture (which contains other additives besides glyphosate) should be

repeatedly the need to mitigate and monitor the impact on health due to the destruction of food crops, pointing to the effect on a population already living in poverty. Neither the State Department nor the Colombian government deny that food crops are destroyed along with illicit crops when planted together, as is often

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changed because of the potential for “acute eye toxicity.” A much more detailed analysis of the potential health and environmental impact of the fumigation program can be found on [www.amazonalliance.org](http://www.amazonalliance.org).

#### **Lack of food aid**

A major health impact of the fumigation program is its destruction of food crops without provision for food aid. The Ombudsman’s Office has stressed

the case, presenting an immediate problem of hunger for the families affected. According to interviews with regional staff from the Red de Solidaridad in LAWG’s February 2002 trip to Tolima, Cauca and Nariño provinces, it is against national policy for the Red, which provides the major governmental assistance to displaced people, to include those fleeing fumigation as legitimately displaced. In some areas the Red is therefore not providing any aid to those

leaving fumigated areas, while in others it is beginning to put together some programs providing a month of food aid. At best, programs are makeshift and partial. Regional officials noted that local

because not a single alternative development program existed.

Thus, the report simply provides a chart listing the departments of Colombia, a

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governments are often not provided with advance warning of fumigation and so cannot prepare to provide food aid, even if funding were available.

## II. Compliance with Alternative Development Provisions

The fumigation conditions state that funds may not be spent on the purchase of herbicides for fumigation “unless alternative development programs have been developed, in consultation with communities and local authorities in the departments in which such aerial coca fumigation is planned, and in the departments in which such aerial coca fumigation has been conducted, such programs are being implemented.” The intention of this provision was to ensure that adequate effort was spent to offer alternative development programs to small farmers willing to eradicate, that fumigation was not used in place of alternative development, and that communities were consulted in the design and implementation of programs.

The State Department report interprets the provision to mean that if there is a single alternative development project in a given department, or geographic province of Colombia, that the provision is met, and all illicit crops in the department can be fumigated. Even with this loose interpretation, fumigation had to be stopped temporarily in one department

check to indicate whether any alternative development programs exist in the department, and a check to indicate whether fumigation took place. There is no information in the report about the extent of the programs or the status of implementation. Moreover, the existence of any alternative development project is considered adequate, including preexisting Colombian government programs, and programs by the UN and European governments.

By all accounts, alternative development projects since Plan Colombia started have begun slowly and been plagued by numerous problems in implementation. Among the most notorious early failures were the delivery of industrial chickens with their beaks removed, without the special feed to keep them alive. “Farmers and aid workers said that in repeated incidents, NGO-delivered chicks starved to death or were eaten after being sent to farmers without promised feed.”<sup>13</sup>

The Colombian Comptroller General’s report evaluating Plan Colombia states that according to the Colombian alternative development agency PLANTE, alternative development projects were promoted in 28,485 hectares of Colombian territory from 1997-2001.<sup>14</sup> Fumigation, according to the comptroller, covered about 108,800 hectares in 2001 alone.<sup>15</sup> If these figures are accurate, fumigation covered 3.8 times as much territory in 2001 as alternative



development projects covered in the five years from 1997-2001. The State Department's August 12, 2002 fact sheet "Country Program: Colombia," states that USAID's program "has supported close to 4,500 hectares of licit crops in coca and poppy growing areas and has benefited nearly 11,000 small rural families in exchange for elimination of approximately 5,000 hectares of illicit crops."<sup>16</sup> There are complications to comparing hectares fumigated with hectares provided with alternative development; for example, some areas fumigated would be larger farms, not eligible for alternative development, some small farmers would reject alternative development, and a number of small farmers are served by infrastructure development rather than direct productive investment, increasingly USAID's focus. However, it is clear that aerial fumigation far outpaces alternative development programs.

The Comptroller General's report cites a range of reasons for implementation delays and problems, from inadequate resources, to lack of capacity and experience in the affected regions of NGOs, to excessive bureaucracy and poor planning. The report cites the lack of food aid in the short term and lack of realistic prospects for production and

marketing in the long term. The latter problem is a dilemma facing even the most well-planned alternative development projects.

However, the larger issue is that there is no intention by the US and Colombian governments to have alternative development projects available in more than a fraction of the areas covered by aerial fumigation. In the last year, the US Embassy has downplayed the prospects for alternative development in the Putumayo region in particular, declaring a retreat from aid to individual farmers or to communities involved in social pacts and refocusing energy on road-building and other infrastructure projects. At the same time, the embassy declared its intention to step up the pace of aerial fumigation to 150,000 hectares in 2002 and 200,000 in 2003, with a number of areas being subject to fumigation two to three times per year. The hope is that farmers will be so discouraged by aerial fumigation that they will abandon coca whether or not they receive any assistance.

There is a stunning lack of evaluation by the US government of the potential of fumigation, applied with little or no development and humanitarian aid, for displacing people, and coca cultivation, from one area to the next. One US Embassy antinarcotics official commented proudly that in Guaviare province, where the fumigation program had first started several years ago, he had "some nice photos of abandoned fields." When asked, "Where did those people go?," he admitted he had no idea—there was no study of what had happened to the coca farmers in Guaviare.<sup>17</sup>

Finally, the State Department report does not bother to assess the provision of the fumigation conditions that alternative development should be consulted with local communities. USAID has made some efforts to do consultations with some of the communities slated for its early eradication program. The Comptroller

General's report, however, notes the "generalized criticism of Plan Colombia ... of the scarce or almost nonexistent mechanisms in citizen participation for the control and monitoring of the resources [within the plan]."<sup>18</sup>

An unexamined cost of the failure to deliver promised alternative development aid and the indiscriminate fumigation of small farmers and indigenous communities is the erosion of whatever remnants of trust remain between residents of targeted areas and the national and local officials. Local mayors and governors are placed in a particularly difficult position; in many cases, they have tried to protect their constituents by advocating for aid and against indiscriminate fumigation, but their views have no impact on national policy. This erosion of trust can lead some farmers to reject eradication and can also make the population more susceptible to guerrilla recruitment.

## Conclusion

The State Department's report on fumigation carefully outlines a procedure for compensation for legal crops damaged by aerial spraying which looks good on paper, but does not exist in practice. Even such a paper procedure does not exist for health-related claims. The alternative development section of the report does not take seriously the intent behind that provision, takes cynical advantage of loopholes in the law, and provides no information of particular value.

These two provisions were intended by Congress to ensure that the United States' aid to Colombia was a balanced package that provided substantial alternatives to small farmers and guarded against fumigation impact on farmers innocent of illicit crop production. The report provides absolutely no reassurance that these issues are addressed.

## Fumigation Conditions in the FY2002 Foreign Aid Appropriations Bill

*"Provided further, That funds appropriated by this Act that are used for the procurement of chemicals for aerial coca fumigation programs may be made available for such programs only if the Secretary of State, after consultation with the Administrator of the Environmental Protection Agency, the Secretary of the Department of Agriculture, and, if appropriate, the Director of the Centers for Disease Control and Prevention, determines and reports to the Committees on Appropriations that: (1) aerial coca fumigation is being carried out in accordance with regulatory controls required by the Environmental Protection Agency as labeled for use in the United States, and after consultation with the Colombian Government to ensure that the fumigation is in accordance with Colombian laws; (2) the chemicals used in the aerial fumigation of coca, in the manner in which they are being applied, do not pose unreasonable risks or adverse effects to humans or the environment; and (3) procedures are available to evaluate claims of local citizens that their health was harmed or their licit agricultural crops were damaged by such aerial coca fumigation, and to provide fair compensation for meritorious claims; and such funds may not be made available for such purposes after six months from the date of enactment of this Act unless alternative development programs have been developed, in consultation with communities and local authorities in the departments in which such aerial coca fumigation is planned, and in the departments in which such aerial coca fumigation has been conducted such programs are being implemented."*

**Sources:**

Colombian Government's Ombudsman's Office, Resolution No. 026, "Human Rights and International Humanitarian Law in the Framework of the Armed Conflict and Fumigations of Coca Crops in Putumayo Province," October 9, 2002.

Comptroller General of Colombia, *Evaluation of Plan Colombia, Third Report*, July 2002.

Colombian Government's Ombudsman's Office, Amicus Brief, OPIAC court case before Constitutional Court, May 2002.

Colombian Government's Ombudsman's Office, "Position of the Colombian Ombudsman Office on the Eradication of Illicit Crops through Aerial Application of Chemicals," 2002.

Colombian Government's Ombudsman's Office, letter to Minister of Justice Rómulo Gonzalez Trujillo from the Ombudsman Eduardo Cifuentes, July 22, 2002.

USAID - Colombia, "USAID - Colombia: Alternative Development, Fact Sheet," April 2, 2001.

Bureau for International Narcotics and Law Enforcement Affairs, US Department of State, "Country Program: Colombia," August 12, 2002.

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had left Putumayo for Nariño and with the Governors of Cauca, Putumayo, Nariño and Tolima.

**Notes**

- <sup>1</sup> Colombian government Ombudsman's Office, Resolution no. 026, "Human Rights and International Humanitarian Law in the Framework of the Armed Conflict and the Fumigation of Coca Cultivation in the Province of Putumayo," October 9, 2002, p. 24.
- <sup>2</sup> Ibid, p. 22.
- <sup>3</sup> Colombian government Ombudsman's Office, Amicus brief prepared for OPIAC court case, 2002, p. 14
- <sup>4</sup> It is important to note that the fumigation conditions only cover coca cultivation, not poppy. Because poppy crops are grown on smaller plots even more closely interspersed with food crops and neighboring plots which may or may not contain poppy, destruction of food crops could potentially be greater in the poppy growing areas.
- <sup>5</sup> Colombian government Ombudsman's Office, Resolution no. 026, "Human Rights and International Humanitarian Law in the Framework of the Armed Conflict and the Fumigation of Coca Cultivation in the Province of Putumayo," October 9, 2002, pp. 24-25.
- <sup>6</sup> "They Denounce a Massive Exodus of Small Farmers from Putumayo," *El Tiempo*, September 6, 2002.
- <sup>7</sup> Organización zonal indígena del Putumayo (OZIP), "Plan Colombia Planes, Loaded with Glyphosate, Destroy Indigenous Communities of the Amazon, Destroy Investments in Indigenous Communities, Carried Out with Resources from the Government and International Donations," September 7, 2002.
- <sup>8</sup> Eder Jair Sanchez, letter to LAWG, September 13, 2002.
- <sup>9</sup> "On a number of occasions and despite having signed pacts of voluntary eradication, small-sized farms have been the subject of indiscriminate fumigations." Colombian government Ombudsman's Office, Amicus brief prepared for OPIAC court case, 2002.
- <sup>10</sup> Farmer interviewed in Reuters story, Phil Stewart, "Coca Farmers Say Colombian Crop Substitution Fails," December 20, 2001.
- <sup>11</sup> Ombudsman's Office, Resolution No. 026, "Human Rights and International Humanitarian Law in the Framework of the Armed Conflict and Fumigations of Coca Crops in Putumayo Province," October 9, 2002, p. 17.
- <sup>12</sup> Comptroller General of Colombia, *Evaluation of Plan Colombia, Third Report*, July 2002, p. 62.
- <sup>13</sup> Phil Stewart, "Coca Farmers Say Colombian Crop Substitution Fails," Reuters, December 12, 2001.
- <sup>14</sup> Comptroller General of Colombia, *Evaluation of Plan Colombia, Third Report*, July 2002, p. 23.
- <sup>15</sup> Ibid, p 23-24.
- <sup>16</sup> Bureau for International Narcotics and Law Enforcement Affairs, US Department of State, "Country Program: Colombia," August 12, 2002.
- <sup>17</sup> Interview with US Embassy anti-narcotics official, February 2002.
- <sup>18</sup> Comptroller General of Colombia, *Evaluation of Plan Colombia, Third Report*, July 2002, p. 57.