

Comments Pertaining to the
Review of Bolivia's Designation as a Beneficiary Country
Under the ATPA and ATPDEA

Submitted to the
Andean Subcommittee
Trade Policy Staff Committee
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by

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Decertifying Bolivia: Bush Administration “Fails Demonstrably” to Make its Case

On September 16, 2008, the Bush administration announced its determination that Bolivia had “failed demonstrably during the previous 12 months” to adhere to its “obligations under international counternarcotics agreements.”¹ Ten days later, the Administration announced its intent to make Bolivia ineligible for benefits under the Andean Trade Promotion and Drug Eradication Act (ATPDEA), asserting that “Bolivia’s demonstrable failure to cooperate in counternarcotics efforts over the past 12 months indicates that Bolivia is not meeting important criteria” to qualify for the tariff preferences.²

The Bush administration’s “decertification” of Bolivia came just days after Bolivia expelled the U.S. ambassador, whom President Evo Morales accused of conspiring against the government.³ Departing Bolivia on September 14, the expelled U.S. ambassador, Philip Goldberg, warned Bolivians that the decision to expel him “could have serious impacts that have not been appropriately weighed.”⁴

In explaining Bolivia’s decertification at a September 16 press briefing, David T. Johnson, Assistant Secretary of State for International Narcotics and Law Enforcement Affairs, remarked that the decertification “was not a hasty decision.”⁵ Asked specifically whether the decertification was “linked to the ambassador being kicked out or any other tit-for-tat,” Assistant Secretary Johnson said that it was not. But these protests deny the obvious – that the decision to decertify Bolivia was a reprisal against the Morales government for having just expelled the U.S. ambassador – not because of Bolivia’s supposed “demonstrable failure” in drug control.

Following Morales’s election as president in December 2005, many observers expected that drug policy would be one of the most contentious issues in U.S.-Bolivian relations. To be sure, the Bush administration has often expressed its discomfort over Bolivia’s coca policies,⁶ and there has

¹ Presidential Determination No. 2008-28, *Major Drug Transit or Major Illicit Drug Producing Countries for Fiscal Year 2009* (Washington, D.C.: Office of the Press Secretary, 2008). The determination also found that it was “vital to the national interests of the United States” to continue “support for bilateral programs in Bolivia.”
<http://www.state.gov/p/inl/rls/prsr/ps/109777.htm>.

² Office of the United States Trade Representative (USTR), *U.S. Trade Representative Schwab Announces Proposed Suspension of Bolivia’s Trade Benefits* (Washington, D.C.: USTR, 26 September 2008).
www.ustr.gov/assets/Document_Library/Press_Releases/2008/September/asset_upload_file663_15152.pdf

³ *Los Tiempos*, “Morales declara persona no grata a embajador EE.UU. y le pide que se vaya,” Cochabamba, 10 September 2008.
http://www.lostiempos.com/noticias/10-09-08/10_09_08_ultimas_nac11.php

⁴ *Los Tiempos*, “Embajador EE.UU. se despide de Bolivia y avisa de «efectos» de su expulsión,” Cochabamba, 14 September 2008.
http://www.lostiempos.com/noticias/14-09-08/14_09_08_ultimas_nac10.php

⁵ U.S. State Department, “Remarks on Release of the Annual Report on the Major Illicit Drug Producing Countries for Fiscal Year 2008,” press briefing, David T. Johnson, Washington, D.C., 16 September 2008.
<http://www.state.gov/p/inl/rls/rm/109783.htm>

⁶ For additional information on the Bolivian government’s drug control policy, see Kathryn Ledebur and Coletta A. Youngers, *Crisis or Opportunity? Bolivian Drug Control Policy and the U.S. Response*, published by the Andean Information Network (AIN) and the Washington Office on Latin America (WOLA) in June 2006; *Update on Drug Policy Issues in Bolivia*, November 2006; and *Balancing Act: Bolivia’s Drug Control Advances and Challenges*, May 2008.

been ongoing friction along with at times harsh rhetoric on the part of both governments. But on the whole, the bilateral drug control relationship has been characterized by fairly close cooperation.

President Morales took office in January 2006. The Bush administration did not decertify the Morales government in September 2006, nor in September 2007. Nor was there any indication, prior to Ambassador Goldberg's expulsion, that things would be different in September 2008. As recently as March 2008, the State Department noted in its annual International Narcotics Control Strategy Report (INCSR) that "Bolivian and U.S. officials meet regularly to coordinate policy, implement programs/operations, and resolve issues." Moreover, the March 2008 INCSR noted that in 2007 Bolivia had "surpassed its own coca eradication goal of 5,000 hectares"⁷ (one hectare equals 2.47 acres) and that "[a]ll seizure and interdiction statistics increased in comparison to 2006." Even with regard to the Bolivian government's policy of pursuing coca reduction through negotiated, voluntary eradication, the 2008 INCSR highlighted close cooperation:

"Despite challenges in transitioning to a new policy environment, bilateral cooperation in Integrated Alternative Development (IAD) remains strong. In the early part of 2007, the U.S. Mission, in consultation with Government of Bolivia counterparts, adjusted its IAD program to more strategically support the GOB's net coca rationalization strategy and diversified development with declining budget resources."⁸

Bolivia's Decertification in Context

The Bush administration evidently chose to use drug decertification and suspension from ATPDEA in an attempt to punish the Morales government for expelling the U.S. ambassador. In order to justify labeling Bolivia a "demonstrable failure" in drug control, the Administration perpetuated serious inaccuracies and distortions of the record. The next U.S. administration and Congress should not be deceived by the Bush administration's decision to decertify Bolivia, but be prepared to consider Bolivia's policies fairly and without prejudice. To be sure, Bolivia faces real drug control challenges, and a respectful bilateral partnership should be in the interests of both countries.

- **The latest estimates of coca growing and cocaine production need to be viewed in a broader regional and historical perspective.** With demand for cocaine remaining stable in the United States and rising elsewhere in recent years,⁹ coca growing has been on the rise in each of the three of the major Andean producing countries – Colombia, Peru and Bolivia. The official U.S. estimates suggest that in 2006 overall Andean coca cultivation may have reached its highest level in 20 years.¹⁰ For 2007, the U.S. estimates for coca growing in Bolivia and Peru have not yet been made public; instead, U.S. agencies have been citing as official the estimates developed by United Nations Office on Drugs and Crime (UNODC). The UNODC figures indicate a net 16 percent increase from 2006 to 2007 in the land area under coca cultivation in

⁷ United Nations Office on Drug and Crime (UNODC), *Coca Cultivation in the Andean Region: A Survey of Bolivia, Colombia and Peru* (Vienna: UNODC, June 2008). According to UNODC, in 2007 Bolivia eradicated 6,269 hectares of coca, equivalent to 15,491 acres or 24.2 square miles (one hectare equals 2.47 acres).

⁸ U.S. State Department, 2008 International Narcotics Control Strategy Report (INCSR), 29 February 2008. <http://www.state.gov/p/inl/rls/nrcrpt/2008/>

⁹ For example, see European Monitoring Centre for Drugs and Drug Addiction (EMCDDA), *Monitoring the Supply of Cocaine to Europe* (Lisbon: EMCDDA, October 2008).

¹⁰ WOLA, *Reality Check*, June 2007.

the Andes, led by a 27 percent jump in Colombia.¹¹ By comparison, the increases reported for Peru (4 percent) and Bolivia (5 percent) were relatively small. Overall, Colombia accounted for 85 percent of the net 24,700 hectare increase region-wide, while Peru accounted for 9 percent and Bolivia for 6 percent.

- Moreover, according to UNODC, Bolivia's 5 percent (1,400 hectare) coca increase in 2007 came on top of an 8 percent (2,100 hectare) increase in 2006.¹² **Even so, Bolivia's combined increase in land devoted to coca growing from 2005-2007 (3,500 hectares) amounted to just 17 percent of the single-year increase in coca growing in Colombia in 2007 (21,000 hectares).**

While the robust global cocaine market suggests that coca production will continue to expand rather than contract, the available data indicate that coca cultivation has been expanding most rapidly in Colombia, where the government – backed by billions of dollars in U.S. aid – has aggressively pursued a forced eradication campaign, featuring aerial herbicide spraying. Although the Bush administration has extolled Colombia's efforts and expressed skepticism about the Bolivian government's negotiated, voluntary approach to coca reduction, the increases in coca growing recorded in Bolivia have been minor compared to the increases in Colombia. (At the September 16 press briefing during which Assistant Secretary Johnson criticized Bolivia, he noted regarding Colombia that, "While challenges remain, Colombia continues to disrupt the drug trade with effective eradication and interdiction programs."¹³)

The results suggest that while the Colombian approach is failing and requires urgent revision,¹⁴ the Bolivian approach holds promise that containment and a gradual leveling of coca growing might be achieved through an emphasis on development (including coca income) and negotiated reductions. Bolivia faces daunting challenges, but the government's alternative strategy has much potential to be more successful in the long term than forced eradication.¹⁵

- **The Bush administration's tenure has fueled bipartisan concerns that the U.S. drug policy numbers are more about political spin than about reality.** Republican Senator Charles Grassley (Iowa) has lambasted the White House Office of National Drug Control Policy (ONDCP) for cherry picking the data. "When it comes to statistics, I think it's fair to say they cook the books," Sen. Grassley told National Public Radio in 2007. "They use whatever statistics fit their public relations program."¹⁶ The next U.S. administration would do well to be transparent and candid about the drug policy numbers – as flawed and uncertain as they are – so that policy can be made on a more realistic basis.

¹¹ UNODC, June 2008. Whereas the methods behind the official U.S. estimates are unknown to the public, at least UNODC describes its estimation methods and acknowledges their shortcomings.

¹² UNODC, *Coca Cultivation in the Andean Region: A Survey of Bolivia, Colombia and Peru* (Bolivia, Colombia, Peru: UNODC, June 2007), and UNODC, June 2008.

¹³ Johnson, 16 September 2008.

¹⁴ For detailed suggestions on what a more effective U.S. policy toward Colombia would entail, see Latin America Working Group Education Fund, Center for International Policy, WOLA, and U.S. Office on Colombia, *A Compass for Colombia Policy*. (Washington, D.C.: October 2008).

¹⁵ AIN and WOLA, *Balancing Act*, May 2008.

¹⁶ For more information on the controversies over ONDCP's handling of the statistics, see WOLA, *Connecting the Dots: ONDCP's (Reluctant) Update on Cocaine Price and Purity*, April 2007.

Justifying the Bush Administration's Bolivia Decertification: The Rationale versus the Reality

Beyond the September 16 presidential determination designating Bolivia as a country that had “failed demonstrably” on drug control, there is no written public document detailing the Administration’s justification for the decertification. The official rationale, such as it is, was provided by Assistant Secretary Johnson at his September 16 press briefing.¹⁷ Several of Johnson’s assertions were then repeated by the Office of the U.S. Trade Representative (USTR) in its September 26 announcement of the Bush administration’s proposal to suspend Bolivia from ATPDEA eligibility.¹⁸ These assertions appear below, followed by more accurate and informed summaries of the situation.

STATE DEPARTMENT: “The expansion of cultivation and lack of controls on coca leaf resulted in a 14% increase in the area of coca under cultivation, and an increase in potential cocaine production from 115 to 120 metric tons.”¹⁹

USTR: “[A] marked increase in cocaine production [...]”²⁰

- The 14 percent increase asserted by the State Department is nearly triple the 5 percent increase reported by UNODC for 2007. As noted above, the U.S. government has yet to publish its own estimates on Bolivia for 2007, and has been referring to UNODC figures as official. For 2006, ONDCP had reported no increase in Bolivian coca growing.²¹
- The 8 percent and 5 percent increases in Bolivian coca growing reported by UNODC for 2006 and 2007, respectively, represented a cumulative two-year increase of 3,500 hectares (13 percent). But over the same time period, UNODC figures indicated a cumulative increase of 5,500 hectares of coca in Peru (57 percent greater than the increase in Bolivia). And as noted above, for 2007 alone, UNODC reported a 21,000-hectare increase of coca in Colombia **(500 percent greater than Bolivia’s combined increase over two years)**.²²
- In 2007 the Bolivian government eliminated 6,269 hectares of coca, surpassing its self-established goal of 5,000 hectares, which the U.S. termed an “accomplishment.”²³ On October 29, 2008, Bolivian government officials announced that they had met their annual 5,000-hectare goal.²⁴
- UNODC estimated that Bolivia’s potential cocaine production rose by 10 metric tons in 2007, to 104 metric tons, an 11 percent increase. Even so, UNODC figures indicate that Bolivia

¹⁷ Johnson, 16 September 2008.

¹⁸ USTR, 26 September 2008.

¹⁹ Johnson, 16 September 2008.

²⁰ USTR, 26 September 2008.

²¹ Office of National Drug Control Policy (ONDCP), *2006 Counternarcotics Assessment for Bolivia*, 25 April 2007. For 2006, ONDCP found Bolivian coca growing to have been “statistically unchanged as compared to the 2005 estimate range of 21,400 and 32,500 hectares.” <http://www.whitehousedrugpolicy.gov/news/press07/042507.html>.

²² UNODC, 2006 and 2007.

²³ State Department, 2008 INSCR, 29 February 2008.

²⁴ ABI, “Bolivia cumplirá este sábado con meta anual de erradicación de coca,” 30 October 2008.

accounts for 10 percent of total Andean cocaine production, with Peru (29 percent) and Colombia (60 percent) accounting for by far larger shares of overall cocaine production.

STATE DEPARTMENT: “Recently, cocalero syndicates – endorsed by the Government of Bolivia – expelled the United States Agency for International Development from the Chapare region where they ran a number of programs to promote the development of economic alternatives to coca cultivation.”²⁵

USTR: “The recent expulsion of U.S. Agency for International Development personnel [...]”²⁶

- Coca farmers did not “expel” USAID programs. Instead, in a decision announced on June 24, they opted to sign no further agreements with the agency, which had a long history of ineffective programs in the Chapare region. Villa Tunari Mayor Feliciano Mamani clarified that the decision to undertake no new projects with USAID did not imply its expulsion from the region, and that the projects currently under way would continue: “As of today, they [the officials in the Chapare] will not sign any new agreements.” Bolivian Vice Chancellor Hugo Fernández confirmed that USAID projects “will continue to their conclusion, but there will be no new agreements. Nothing is being broken; the existing agreements will continue to be valid and will continue until their conclusion.”²⁷
- Even this was a largely a symbolic gesture; USAID had already planned to shift the bulk of its limited Chapare activities to the La Paz Yungas in 2009, and Chapare municipalities had found other funding sources in Europe and elsewhere. According to the 2008 INCSR, “Relatively more resources will be devoted to the Yungas; an under-developed coca growing region [...] Assistance to the Chapare will continue to decline.”²⁸ As a result, the number and scope of projects affected by the decision to not sign agreements was minimal.
- It is also important to note that not all USAID programs in the Chapare region will be winding down. The USAID-funded Justice Ministry Office in Chimoré – which offers basic legal services to Chapare residents – continues to operate without opposition or protest from cocaleros. Although USAID withdrew some staff members, it continues to pay for the office’s operations and salaries through Checchi and Cia, the contractor for administration of justice. USAID also continues to fund road infrastructure projects through Caminos Vecinales.²⁹
- The decision to sign no further agreements with USAID in the Chapare was based primarily on local frustration with alternative development aid conditioned on prior coca eradication. Chapare farmers continue to work closely with European Union (EU)-funded development initiatives. This realistic, collaborative approach supports the Bolivian government’s effort to replace traditionally conceived “alternative development” projects with integral and sustainable

²⁵ Johnson, 16 September 2008.

²⁶ USTR, 26 September 2008.

²⁷ *Los Tiempos*, “Usaid deja el trópico y EEUU teme por la seguridad de su personal,” Cochabamba, 26 June 2008.

²⁸ State Department, 2008 INCSR, 29 February 2008.

²⁹ AIN interviews with: Pedro Sejas, Acting Director of the Integrated Justice Center; Ronny Agreda, Official Mayor, Villa Tunari Municipal Government; and representative of USAID contractor, 22 October 2008.

economic development. In contrast to the U.S. programs, the EU approach takes into account the importance of coca production as a source of subsistence and for local consumption.

STATE DEPARTMENT: “And last week the Drug Enforcement Administration was similarly expelled from the Chapare. These actions form part of an apparent Government of Bolivia policy to restrict the scope of U.S. support for its counternarcotics efforts. These actions represent a retreat from Bolivia’s international obligations to control cocaine trafficking.”³⁰

USTR: “...the removal of U.S. Drug Enforcement Administration officials from the main areas of Bolivia’s illegal coca production [...]”³¹

- The Bolivian government did not expel the DEA. U.S. officials have claimed that DEA agents received a call on September 9 from a Bolivian anti-drug force commander, informing them that they were unsafe in the Chapare and that cocaleros in the region were intending to attack them.³² But the commander of UMOPAR (Bolivia’s Rural Mobile Patrol Unit), has denied the claim that coca growers have threatened the DEA, on September 9 or at any other time.³³ The DEA compound at the Chimore base is highly guarded in any case, although coca growers have never attempted to attack it.
- The UMOPAR commander also underscored that even after “decertification,” UMOPAR continues to work closely with the DEA, and that the interdiction activities of the FELCN (Bolivia’s Special Drug Control Police Force) and the DEA continue to be accepted by Chapare residents, and had not faced security risks.”³⁴ Indeed, Bolivian anti-drug commanders consistently cite community support for interdiction efforts involving the DEA. According to the UMOPAR commander in the Chapare, “people don’t want their community to be implicated in drug trafficking, so social control is contributing to better counterdrug efforts.”³⁵
- The representative of the Narcotic Affairs Section (NAS), the U.S. agency that supervises the DEA, continues to work at the Chimore anti-drug base.³⁶ DEA agents still work in the La Paz Yungas and in other major coca-producing and trafficking regions of the country. They were only withdrawn from Santa Cruz and Cochabamba.
- When pressed by questioners at the September 16 briefing, Assistant Secretary Johnson backed away from his assertion that the DEA was “expelled from the Chapare.”³⁷

³⁰ Johnson, 16 September 2008.

³¹ USTR, 26 September 2008.

³² AIN-WOLA interview with State Department official, 17 September 2008.

³³ AIN telephone interview with high-ranking Bolivian anti-drug commander, 2 October 2008.

³⁴ Ibid.

³⁵ Ibid.

³⁶ AIN e-mail communication with Joseph Manso, Director, Narcotics Affairs Section, U.S. Embassy, La Paz, 28 October 2008.

³⁷ Johnson, 16 September 2008.

ASSISTANT SECRETARY JOHNSON: The steps that were undertaken were undertaken not because of a threat or expulsion from the Government of Bolivia, which – as I said in the text, but by actions which were undertaken by the cocaleros in the region with the support of the government. They forced out USAID and they took similar steps that gave us no choice but to remove the people from the DEA.

STATE DEPARTMENT: “Much of the surplus coca leaf production is traded in unregulated, so-called legal markets and is diverted to cocaine production.”³⁸

USTR: “[T]he government’s failure to close illegal coca markets [...]”³⁹

- Each of the six coca-growing federations has its own legal, regulated market in which they trade coca. A system of permits and guidelines exist for these markets, although the level of enforcement and control of norms is inconsistent.
- According to UNODC, in 2007 there was a 30 percent increase in coca sales to the Bolivian government agency that regulates market prices and quantities in the major coca producing regions.⁴⁰ The prices offered by this agency are also higher on average than those in the unregulated markets, encouraging farmers to sell their coca crops for traditional and legal purposes rather than to the illicit drug market.
- In June 2006 the Morales government implemented a policy to permit each coca grower union affiliate to barter 150 pounds of coca every three months and allow legally authorized organizations to purchase coca for traditional use directly from legal markets without intermediaries. Bolivian law states: “The production, circulation and marketing of coca are subject to State control, through the appropriate agency of the Executive, and shall be the subject of special regulations within the legal framework of the present Law (Article 15, Law 1008). The Executive shall establish a system of permits and monitoring, both for producers and for transporters and merchants (Article 19, Law 1008).”

STATE DEPARTMENT: “President Morales continues to support the expansion of licit coca leaf production, despite the fact that current legal cultivation far exceeds the demand for legal traditional consumption and exceeds the area permitted under Bolivian law.”⁴¹

USTR: “[...] publicly stated policies that increase government-sanctioned coca cultivation, have placed in doubt the Bolivian government’s commitment to cooperate in the fight against drug trafficking.”⁴²

- Even at the peak of U.S.-funded forced eradication, coca production was never reduced to the 12,000-hectare ceiling established by Law 1008, nor has a scientific study ever been conducted to accurately gauge the size of the market for legal consumption of coca. The European Union is currently funding a comprehensive study that the Morales government has agreed to use as a guideline to set the legal limit for coca cultivation.

QUESTION: Okay, well – but expelled – they were not expelled.

ASSISTANT SECRETARY JOHNSON: Well, I mean, I suppose you can quibble – you can quibble over whether –

QUESTION: Well, they expelled the Ambassador, but they didn’t expel these people. They didn’t physically say, “You have to leave,” right?

ASSISTANT SECRETARY JOHNSON: They made it clear to us that these individuals should not remain there. I find a distinction without a difference.

³⁸ Johnson, 16 September 2008.

³⁹ USTR, 26 September 2008.

⁴⁰ UNODC, June 2008.

⁴¹ Johnson, 16 September 2008.

⁴² USTR, 26 September 2008.

- The 12,000-hectare limit for coca production was arbitrarily determined in 1988 and is not based on a scientifically derived, widely agreed-upon estimate of the amount of coca needed for legal consumption of the coca leaf and related products.
- The Morales administration’s initiative to increase permitted coca production to 20,000 hectares until the conclusion of the legal coca study, still represents a net reduction in the coca crop, estimated by the UNODC to be 28,900 hectares in 2007.⁴³
- The Bolivian government has continued to support the *cato* system that allows each coca growing union member family to cultivate a 1,600-square meter plot of coca. This system has eliminated protests, conflict and human rights violations in the Chapare region and has provided a legal source of subsistence income for farmers.
- This is the third September drug certification determination since President Morales took office, and the fourth since Bolivia adopted the *cato* system under President Carlos Mesa, yet, as noted above, the Bush administration did not decertify Bolivia until now.
- U.S. drug control officials in Bolivia have pointed to U.S. collaboration with the Bolivian government’s coca rationalization policy:

“We support the government of Bolivia’s efforts to undertake coca control and to provide opportunities to those communities who are voluntarily agreeing to rationalize their coca.”⁴⁴

“I don’t think it’s the policy of this government to achieve zero coca in the country, they’ve made that clear. And so, what we’re hoping to do is just achieve a net reduction with the government and they have said they’d like a net reduction; they’d like to bring it down to 20,000 hectares... [and] that’s a step in the right direction... We’re supporting their eradication efforts that go in conjunction with this program... The president’s political base is in the Chapare ... and I know he’s communicated to the cocaleros that they need to start participating in this program.”⁴⁵

Looking Ahead

The Bush administration’s decision to decertify Bolivia came at a time when the international community had come together to address the general political crisis and violence in the Bolivian lowlands. As Bolivia’s South American neighbors rallied in support of the Morales government at a crucial moment, the Bush administration devoted its attention to castigating Bolivia for expelling the U.S. ambassador – and “decertification” was the nearest weapon at hand.

⁴³ UNODC, June 2008.

⁴⁴ Interview with Dr. Mary E. Norris, Director of Integrated Alternative Development, USAID, in “Politics and the People: The State of Coca and Cocaine,” Michael Wilde and Valerie Schenkman, May 2008.

⁴⁵ Interview with Joseph Crook, Grounds Operations Advisor, Narcotics Affairs Section, U.S. Embassy, La Paz, in “Politics and the People: The State of Coca and Cocaine,” Michael Wilde and Valerie Schenkman, May 2008.

However, the Administration could not and did not make a convincing case for decertifying Bolivia, and evidently made the decision for political reasons. This adds to the problem that the certification process itself strikes many in Latin America as the height of arrogance and hypocrisy: the United States – the world’s leading cocaine market – presumes to judge the drug control efforts of other governments. Ideally, the certification process would become less politicized in the hands of a new U.S. administration, but many Latin Americans will likely continue to regard the process itself as demeaning and illegitimate. The premise that U.S. drug control strategies are essentially correct provides the faulty foundation for the certification process. There is abundant evidence – most clearly in the cases of Colombia and of Bolivia during Plan Dignidad – that even extremely diligent pursuit of the U.S.-favored military forced-eradication strategy, undertaken in intimate cooperation with the U.S. government, has not come close to sustainably containing coca and cocaine production, and has no real prospect of doing so.⁴⁶

- The next U.S. administration and Congress should be realistic about the prospects for reductions in coca growing and cocaine production in the Andean region. With the global market for cocaine stable or expanding, “quick-fix” strategies like massive forced eradication will be sure to generate abuses and conflict, but do little to contain coca growing and cocaine production and trafficking.
- Specifically, U.S. policy should no longer condition development assistance on prior eradication of coca, and should ensure that small farmers have viable and sustainable livelihoods apart from coca before eradication is contemplated. Continuing the current U.S. approach will only deepen the misery of small farmers and reinforce their economic reliance on coca growing.
- Beyond trying to get U.S. policy right, in looking to promote drug control cooperation, Congress and the next U.S. administration should emphasize incentives and partnerships rather than sanctions. Above all, the United States should vigorously pursue demand reduction at home, especially through investing ambitiously in access to high-quality treatment for heavy drug users.
- If the United States continues to insist on certifying cooperation with U.S. drug policy, then Congress and the next administration should craft policies that respect human rights and that at least stand a chance of eventual success.

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⁴⁶ See WOLA, *Chemical Reactions – Fumigation: Spreading Coca and Threatening Colombia’s Ecological and Cultural Diversity*, February 2008.