

Working Paper

Peace with hunger and bullets is very difficult

PNIS implementation monitoring report

Diana Machuca

March 2022





About Drugs & (dis)order

'Drugs & (dis)order: building sustainable peacetime economies in the aftermath of war' is a four-year research project generating new evidence on how to transform illicit drug economies into peace economies in Afghanistan, Colombia and Myanmar. It is an international consortium of internationally recognised organisations with unrivalled expertise in drugs, conflict, health and development. Led by SOAS, University of London, project partners are: Afghanistan Research and Evaluation Unit (AREU), Alcis, Christian Aid, Kachinland Research Centre (KRC), London School of Hygiene and Tropical Medicine (LSHTM), Organization for Sustainable Development and Research (OSDR), Oxford School of Global and Area Studies (OSGA), PositiveNegatives, Shan Herald Agency for News (SHAN), Universidad de los Andes, and Universidad Nacional de Colombia.

Funding

This research was funded via the UK Research and Innovation, as part of the Global Challenges Research Fund (GCRF). The views presented in this paper are those of the author(s) and do not necessarily represent the views of GCRF, the UK Government or partner organisations.



UK Research
and Innovation

Contents

Abbreviations and acronyms	5
Acknowledgements	6
1. Introduction.....	7
2. Data and sources	8
2021 survey of PNIS participants.....	8
Government data about the implementation of the PNIS programme.....	9
Interviews and information provided by social organisations	9
3. PNIS design and key commitments	10
Basic elements of the PNIS	11
Participatory model	11
Basic sequencing of intervention and implementation	13
4. General tendencies in PNIS implementation: difficulties identified	15
The coexistence of substitution and forced eradication is a breach of the Peace Agreement	20
During the Duque government, non-compliance has worsened	24
The PNIS has substantially decreased household incomes	26
Systematic exclusion and barriers to accessing substitution	33
Substitution lacks security guarantees for the leaders and participants of the programme	39
Substitution lacks community participation or consultation	42
Non-compliance with the Comprehensive Rural Reform affects the implementation of the PNIS	43
Defunding substitution	45
Lessons learned and possible opportunities for voluntary substitution	47
5. Conclusion.....	52
Bibliography.....	54
Appendix 1. PNIS survey methodology 2021	58

List of tables and figures

Tables

- Table 1. PNIS elements
- Table 2. Participation in the PNIS
- Table 3. PMI indicators for PNIS evaluation
- Table 4. Income before and after the PNIS, 2019
- Table 5. Collective agreements and individual family agreements
- Table 6. Commitments of PNIS participants.
- Table 7. Reasons for suspension
- Table 8. Resources for each point of the Peace Agreement
- Table 9: Ratio of registered officers to PNIS participants

Figures

- Figure 1. Phases and basic steps of PNIS implementation
- Figure 2. Data on PNIS implementation
- Figure 3. Community blockades in the face of forced eradication (2017-2020)
- Figure 4. Mobile eradication groups (2017-2020)
- Figure 5. Opinions on the PNIS programme under the Duque government
- Figure 6. Estimated income before and after the PNIS, 2021 survey.
- Figure 7. Estimated income before and after PNIS, 2019 and 2021 surveys
- Figure 8. Has income increased, decreased or stayed the same since the PNIS?
- Figure 9. PNIS payments received
- Figure 10. Number of payments owed
- Figure 11. Payments received according to PNIS
- Figure 12. Technical assistance received
- Figure 13. Food security resources received
- Figure 14. Resources received for short- and long-term productive projects
- Figure 15. Short- and long-term productive projects in Tumaco according to PNIS
- Figure 16. Active, incoming, withdrawn and suspended PNIS users
- Figure 17. Suspensions and withdrawals
- Figure 18. Murder of substitution leaders
- Figure 19. Murder of human rights defenders linked to illicit crops
- Figure 20. Resources invested in Point 4
- Figure 21. Do you know families enrolled in the PNIS who have replanted coca?
- Figure 22. Do you think the government fulfilled its commitments to the PNIS?
- Figure 23. What has been the biggest drawback to the programme's implementation?
- Figure 24. Do you regret having enrolled in the PNIS?
- Figure 25. What is the best way to transform the illicit drug economy?
- Figure 26. Perceptions of PNIS officials

Abbreviations and acronyms

AFP	Final Peace Agreement
ART	Territorial Renewal Agency
ASOPORCA	Association for a Future for Peasants
CERAC	Conflict Analysis Resource Centre
CGR	Comptroller General of the Republic
CINEP	Centre for Research and Popular Education
CPEC	Presidential Council for Stabilisation and Consolidation
DSCI	Direction for Illicit Crop Substitution
FARC	Revolutionary Armed Forces of Colombia
FCP	Colombia Peace Fund
MEROS	Regional Roundtable of Social Organisations of Putumayo, Baja Bota Caucana and Cofanía Jardines de Sucumbí
PDET	Development Programmes with a Territorial Focus
PGN	Office of the Inspector General of Colombia
PISDA	Comprehensive Community Plans for Substitution and Alternative Development
PMI	Framework Plan for Implementation of the Agreements
PNIS	Comprehensive Program for the Substitution of Crops Used for Illicit Purposes
Recompas	Network of Community Councils of the Pacific South Region
RRI	Comprehensive Rural Reform

Note on currency: 5,000 Colombian Pesos= 1.02 Pounds sterling (09/03/2022)

Acknowledgements

We thank the Global Challenges Research Fund (GCRF) and SOAS University of London, who contributed significantly to the report through the research project *Drugs & (dis)order: building sustainable peacetime economies in the aftermath of war*.

We thank Francisco Gutiérrez who provided comments and advice during the preparation of this report.

We thank Margarita Marín who supported the systemisation and analysis of quantitative data.

We thank Luis Castillo, Bryan Triana and the team at the Land Observatory who reviewed this report before publication and provided substantial and valuable contributions to strengthen the argument and findings presented.

This report was first published in December 2021 by the Observatorio de Tierras as 'La Paz con hambre y bala está muy difícil' (https://www.observatoriodetierras.org/la-paz-con-hambre-y-bala-esta-muy-dificil-informe-de-seguimiento-a-la-implementacion-del-pnis/?doing_wp_cron=1639145488.7611451148986816406250). The Spanish version was edited by Carolina Crosby. The Spanish text was translated from Spanish to English by Mary Ryder, and Karen Brock gave editorial support on this English version.

Note on translation: Citations and terms from the 'Final Agreement to End the Armed Conflict and Build a Stable and Lasting Peace' (henceforth 'Final Peace Agreement'), signed between the Government of Colombia and the FARC-EP on 24 November 2016, are from the official English translation.

1. Introduction

The title of this report, "Peace with hunger and bullets is very difficult", reflects two realities that the families and leaders who took on the difficult task of promoting Colombia's substitution programme have denounced. Firstly, the programme (National Illicit Crop Substitution Programme - PNIS) has caused deterioration their economic situation. In particular, many families enrolled in the PNIS have seen a substantial decrease in their income since entering the programme, which has led to many going hungry. Secondly, by promoting forced eradication rather than substitution during these five years of implementation of the Final Peace Agreement (FPA), the state has not only failed to comply with the Havana agreement, but it has also engaged in violent attacks against peasant farmers who subsist on the cultivation of illicit crops.

Both of these realities, hunger and bullets, are to different extents the product of systematic non-compliance by the state with the essential components of the PNIS. On the one hand, non-compliance is due to improper implementation of the FPA which contravenes its commitments; on the other hand, non-compliance is due to a lack of progress or omission of key aspects in the design. The violation of these commitments by the state, which began during the Santos period and has worsened under Duque's mandate, has contributed to the failure of the programme's central purpose: the transition from an illicit economy towards legal and sustainable economies. This report reveals the systematic nature of non-compliance with the PNIS by the state, based on the following points:

- The state has breached the sequencing of interventions which was set out in the AFP.
- Substitution has not been the main strategy employed to tackle illicit crops. On the contrary, forced eradication has continued during the implementation period which has undermined substitution efforts. This situation has worsened with the new administration of President Duque.
- Failures to comply with the basic components of the substitution programme have led to significant deterioration of the incomes of registered families.
- The implementation of the PNIS has been exclusionary; not everyone who committed to voluntarily substitute their crops has been enrolled in the programme, while families who are already enrolled in the programme have been withdrawn through irregular and non-transparent processes.
- Substitution has put social leaders at high risk of violence.
- The delays and setbacks in the implementation of Comprehensive Rural Reform are significantly impacting the strategic objectives of the PNIS.
- The PNIS has been underfunded.

This report has drawn on several key sources. Firstly, the results of our second survey of PNIS users in Tumaco in May 2021, and the first in 2019, to glean their perceptions regarding the substitution policy. This allowed for a deeper understanding about the extent of non-compliance with the PNIS.

The report also draws on official information about the programme and reports from other institutions that monitor the AFP, which help to contrast and complement these arguments.

The report is structured as follows: first, the data and key sources are introduced. The next section reviews the fundamental commitments of the substitution programme, its main components, and the roadmap, or sequencing of interventions proposed. Next, the report presents an assessment of the PNIS implementation, and the central arguments are developed. A fourth section discusses some of the lessons learned and explores the positive experiences of the programme. Lastly, the report offers some conclusions.

2. Data and sources

2021 survey of PNIS participants

This report is largely based on the Land Observatory's findings from a survey of people enrolled in the PNIS, conducted in May of 2021. In 2019, an initial survey of programme participants in Tumaco and Puerto Asís was carried out, which gave us an overview of how the policy had progressed, the living conditions of the participants and their perceptions of the programme. Due to logistical and security conditions the second survey focused on Tumaco only.

This second survey had the following objectives:

- First, to better understand the socio-economic profiles of coca-growing peasants.
- Second, to record and analyse the perceptions of PNIS registered users about the programme. This exercise is a strategic contribution to the evaluation of public policy, since it concerns how the measures have been received by the target population, which complements the figures already provided regarding the progress of its implementation.
- Third, to compare the results between 2019 and 2021.

In terms of methodology, the 2021 survey differs from the 2019 survey in three ways. First, it focuses only on Tumaco and does not include Puerto Asís. Second, it managed to cover several neighbourhoods in Tumaco that could not be reached in 2019. Third, we made a concerted effort with the Land Observatory team to re-survey as many people who participated in 2019 as possible. Of the 206 people who responded in 2019 in the neighbourhoods visited in Tumaco, 165 responded to the 2021 survey. This comparative exercise allows for a longer-term evaluation of the programme, which included two assessments of very different times: in the middle of the programme (during the Santos-Duque transition) and towards the end of the Duque's presidency.

Our methodology began with a process of consultation with the different ethnic authorities and social leaders in the territory. In April 2021, we held meetings with the governing boards of the community councils which were part of the sample; a network of the community councils (Recompas); and with Community Action Boards affiliated with the Association for a Future for Peasants (ASOPORCA). These meetings enabled the Land

Observatory to consult with local organisations on the survey exercise, and discuss the research questions, the importance of the survey, the work plan and the commitments of participants. Between 18 May and 4 June 2021, a total of 413 people were surveyed, 165 of whom had already participated in the 2019 survey. The survey was carried out in 31 neighbourhoods in the municipality (see Appendix 1 for the survey methodology).

The results of the survey were collaboratively analysed and discussed in multiple events and meetings held in Tumaco between September and October. Afro-descendant leaders, peasant farmers, public officials and other stakeholders participated in these meetings. On 5 October we held a public event to launch the results at the House of Memory (Casa de la Memoria) in Tumaco. This was a crucial moment because it allowed for feedback on the survey and provided an opportunity to redefine advocacy strategies in response to these important results.

Government data about the implementation of the PNIS programme

This report also draws on information collected by different state agencies, mainly those in charge of the implementation and monitoring of the programme, including the Presidential Council for Stabilisation and Consolidation (CPEC) and the Territorial Renewal Agency (ART). The data and analysis collated by the Land Observatory has been complemented and compared with other reports produced by the Inspector General's Office (PGN) and the Comptroller General's Office (CGR). Information produced by institutions that monitor the AFP was also consolidated, including the Technical Secretariat of the Centre of Research and Popular Education (CINEP), the Conflict Analysis Research Centre (CERAC) and the Kroc Institute.

In addition to these public reports, this document uses data that was obtained from numerous freedom of information requests to the CPEC and the ART, which provided information about the families who have been suspended and withdrawn from the programme, the number of PNIS officials, and blockades in forced eradication operations, among others. Via a freedom of information request, we also asked for anonymised data on the state of implementation of the programme in Tumaco. This was crucial information to compare and contrast with the survey results.

Interviews and information provided by social organisations

Multiple field trips were taken in some of the territories affected by illicit crops where the PNIS is being implemented. Interviews and focus groups were carried out with different actors, in particular with participants and leaders involved in the substitution policy, and with local and national officials who manage the substitution programme. The report also makes use of press releases and press notes written by different social organisations, some of whom were involved to the PNIS implementation process.

3. PNIS design and key commitments

The Final Peace Agreement (AFP) states that without a proper solution to the problem of illicit crops and drug trafficking, it will not be possible to achieve "stable and long-lasting" peace in Colombia. On this basis, point 4 of the Agreement proposes a new drug policy based on the following:

- Firstly, "That many regions and communities across the country, especially those in conditions of poverty and neglect, have been directly affected by the cultivation, production and sale of illicit drugs" (AFP, p.104).
- Secondly, a new strategy that takes into account the conditions of marginality signalled above must "provide a different and differentiated treatment to the issue of drug use, the problem of crops used for illicit purposes and organised crime associated with drug trafficking... (and give) special treatment to the weakest links in the drug trafficking chain, namely the people that cultivate and use illicit drugs" (FPA, p.105).
- Thirdly, this new policy "must have a territorial-based approach based on citizen participation and the presence and strengthening, in terms of effectiveness, efficiency and transparency, in particular of the institutions responsible for social care and those responsible for the security and protection of communities" (FPA, p.106).

Taking these factors into account, point 4 proposed the PNIS to address the problem of illicit crop production. The Agreement also established a hierarchy through which the different strategies would be implemented in the affected territories. Point 4 states that in the post-conflict context the main strategy must be voluntary substitution. In the event that this fails, the state can resort to forced eradication, but manual removal must be prioritised, with aerial spraying only to be used as a last resort. This point was set out in the Agreement in the following terms:

"In cases where there is no agreement with the communities, the Government will proceed to remove the crops used for illicit purposes, prioritising manual removal where possible, bearing in mind respect for human rights, the environment, health and well-being. If substitution is not possible, the Government does not waive the instruments that it believes to be most effective, including aerial spraying to ensure the eradication of crops used for illicit purposes. The FARC-EP consider that in any case of removal this must be effected manually." (FPA, p.114).

This sequence was subsequently established by the Constitutional Court in its follow-up order 387 of 2019 to judgment T-236 of 2017, which legally obliged the state to implement voluntary substitution. This law states that:

Point 4.1.3.2 of the Final Agreement, as a public policy that binds the National Government, in the terms of Legislative Act 02 of 2017, established a hierarchy among the methods of eradication, prioritising voluntary substitution over forced eradication, and in turn, establishing that the latter would only proceed in the event of the failure of the

former. In this sense, only in the event that voluntary substitution fails, and after the additional failure of manual eradication, may aerial spraying with glyphosate be used. (Order 387 of 2019).

Basic elements of the PNIS

The PNIS has six main elements, which are described in Table 1 below.

Table 1. PNIS elements

Element	Description
Security conditions	The government will guarantee the security conditions for communities and leaders to participate effectively in the design and implementation of the substitution programme.
Agreements with communities	The agreements will define the timeframes for fulfilling the commitments made by the Government and the communities participating in the PNIS.
Immediate Attention Plan (PAI)	Quick and necessary measures for families who commit to the programme and have previously eradicated their illicit crops. In the first two years of implementation, families will have access to: 1) bimonthly payments of 2 million pesos for one year; 2) food security contributions of 1 million 800 thousand pesos; 3) short- and long-term productive projects of up to 9 and 10 million pesos respectively; 4) technical assistance for 24 months.
Community Immediate Attention Plan (PDET)	Collective assistance for communities that have eradicated their coca crops through improvements to infrastructure, employment opportunities, or the building of community spaces or schools.
Comprehensive Plan for the Substitution of Crops and Alternative Agrarian Development (PISDA)	The PISDAs incorporate a more localised vision of the territories affected by illicit crops. They are integrated with the initiatives proposed in the PDETs, resolving strategic issues such as access to land, access to public goods and services, etc.
Special judicial treatment	The passing of a law to suspend criminal prosecution against those who are committed to voluntary crop substitution.

Sources: Final Peace Agreement (2016); Decree 896 of 2017; Direction for Illicit Crop Substitution, 2017.

Participatory model

In addition to these elements, the PNIS has participation, coordination and decision-making bodies at local, regional and national levels. Table 2 presents this participatory model.

Table 2. Participation in the PNIS

Level	Agency	Description and composition
National	Strategic Steering Board	<p>Four government representatives and four delegates of the National FARC Reincorporation Council.</p> <p>The board is responsible for guiding decisions about PNIS implementation and the general management of the PNIS programme.</p>
	Direction for the Substitution of Crops intended for Illicit Use (DSCI)	<p>Attached to the Office of the Presidential Advisor for Post-conflict Affairs of the Administrative Department of the Presidency of the Republic*.</p> <p>Intended to carry out the decisions taken by the Board, and design and implement the programme's components.</p>
	Permanent Board of Directors	<p>Three government delegates, three delegates of the National FARC Reincorporation Council and representatives of social organisations.</p> <p>Its function is to advise, support and recommend the DSCI on PNIS implementation.</p>
Regional	Rural Advisory Councils (CAT)	<p>Departmental or regional spaces for coordination between the national and regional levels. They are made up of national authorities, former-FARC representatives, community spokespersons and delegates.</p>
Municipality	Municipal Participatory Planning Commissions (CMPP)	<p>Coordination between the community assemblies (at the local or municipal level) to discuss how PNIS implementation can contribute to the construction of the PISDA.</p> <p>Community delegates, PNIS officials, government delegates and FARC representatives will participate in these spaces.</p>

	Municipal Evaluation and Monitoring Councils (CMES)	<p>Responsible for the evaluation and monitoring of implementation of and compliance with the PISDA, the family PAI and the community PAI.</p> <p>Participants include community delegates and PNIS officials, government and municipal delegates, representatives of FARC, and representatives of the National Human Rights Council.</p>
Local/neighbourhood	Community Assemblies	<p>These assemblies, which take place at a local level, form the basis for participation in the PNIS.</p> <p>All actors involved in the programme participate in them: potential users, growers, harvesters.</p>

*This office was abolished during the Duque government. The PNIS was then temporarily coordinated by the CPEC, and subsequently, by the ART (Decree 179 and 2107 of 2019).

Source: Decree 896 of 2017 and Decree 362 of 2018

Basic sequencing of intervention and implementation

In order to prioritise certain territories for the implementation of the PNIS, the FPA established the following selection criteria:

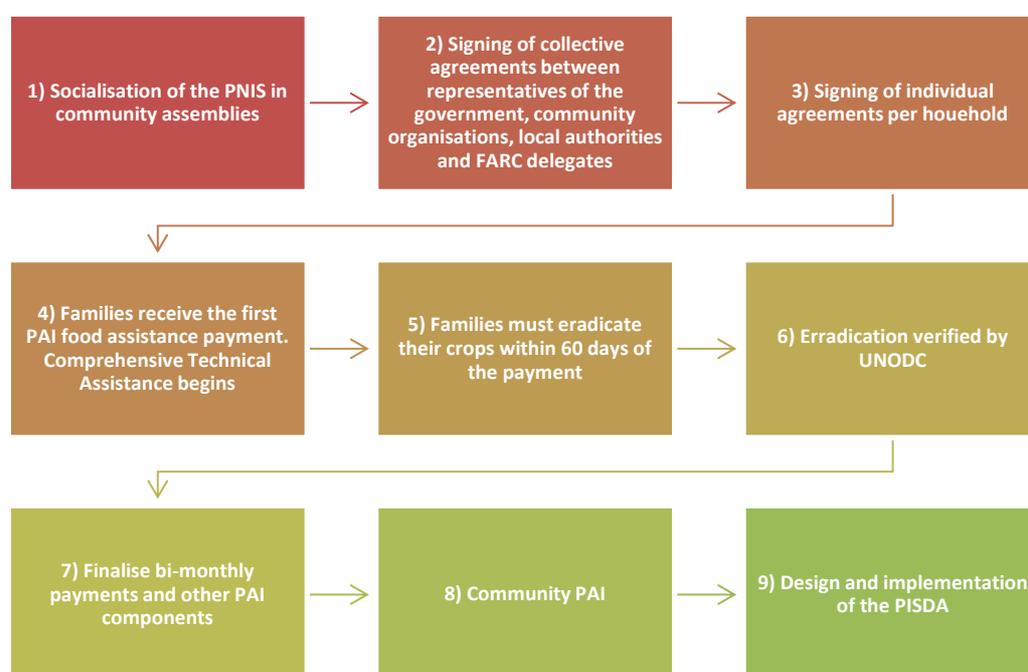
- The zones prioritised for the Development Programmes with a Territorial Focus (PDET).
- Density of crops used for illicit purposes and population density.
- National Natural Parks.
- Cases where communities that are not situated within the territories identified in the preceding criteria have received special judicial treatment.

The programme is primarily intended for peasant families living in poverty, who derive their livelihood from illicit crops and who are willing to commit to substitution and will not replant their crops. Their involvement in illicit activities had to have been before 10 July 2016 (art. 6 Decree 896). On the other hand, the DSCI established the following profiles under which beneficiaries would be registered:

- Grower households: families whose subsistence depends on illicit crops.
- Share-cropper households: families living in regions affected by illicit crop production, but who do not have illicit crops on their plot.
- Harvesters: the people task with picking the coca leaves, i.e., agricultural labourers in the coca economy.

Up to this point, the PNIS had been designed to incorporate previous demands made by social organisations and movements supporting coca-growing peasants (the participation of social organisations, the relationship between substitution and the point 1 commitment, special judicial treatment, the issue of security). However, the substitution proposal also contains a zero-tolerance policy towards illicit crops (Acero & Machuca, 2021), which is a rather radical position that has only been adopted by Colombian governments in this century. During the first year of implementation, increased national and international pressures due to the expansion of illicit crops (Acero et al., 2019) led to eradication being carried out during the initial phases of the programme's implementation, despite the proposed sequence of PNIS implementation shown in Figure 1.

Figure 1. Phases and basic steps of PNIS implementation



Source: Direction for Illicit Crop Substitution, 2017

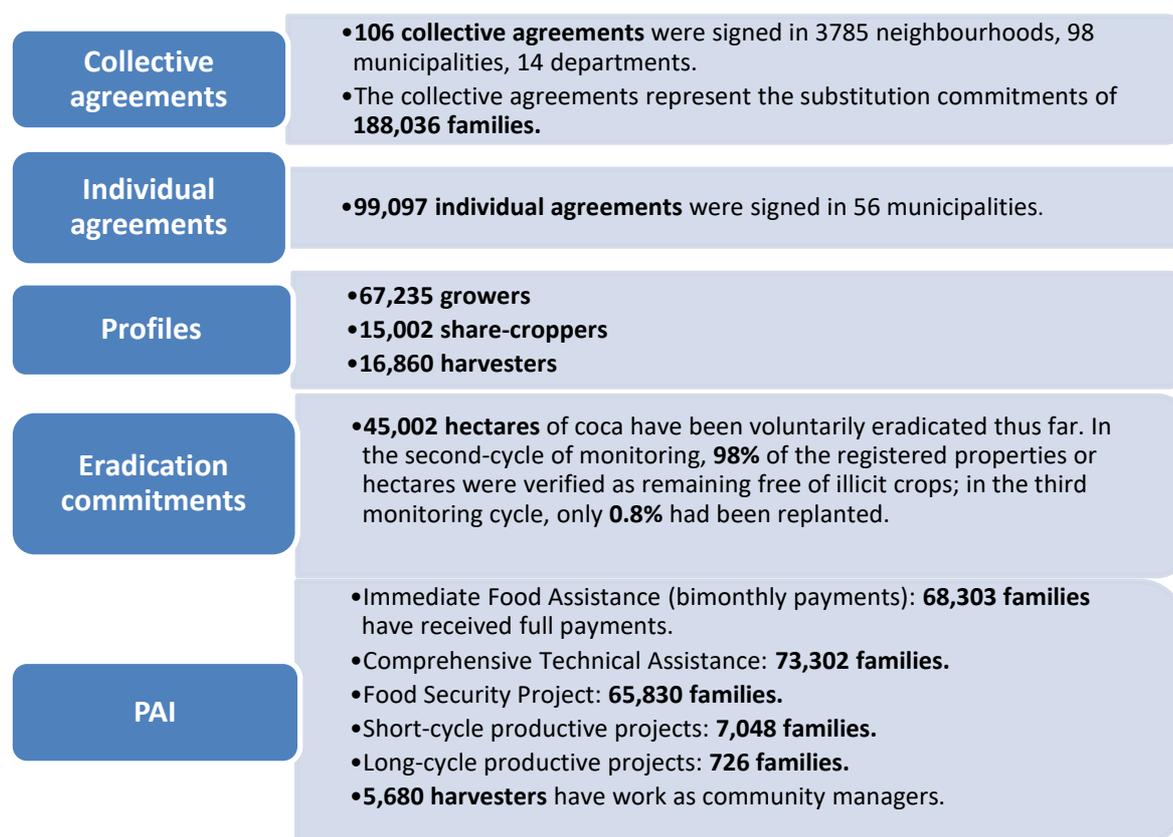
As the above sequencing makes clear, the initial phases of the programme consist of the signing of individual and collective agreements followed by the voluntary eradication of illicit crops by farmers. The other components which are more closely related to the issues of land and access to public services require greater institutional support and are included in the later stages of the design.

4. General tendencies in PNIS implementation: difficulties identified

Five years on from the FPA, and the subsequent introduction of the PNIS interventions, the monitoring and evaluation of the programme's basic components reveal some trends - mainly drawbacks and difficulties - as well as systematic non-compliance by the state with the Agreement's basic components.

First, some key statistics are reviewed in order to build these general arguments about implementation. Figure 2 summarises the relevant data.

Figure 2. Data on PNIS implementation



Sources: Presidential Office for Stabilisation and Consolidation (2019, 2020, 2021a, 2021b, 2021c); UNODC (2020).

Presidential Advisor Emilio Archila has insisted that efforts were made by the Duque administration to implement the programme. In 2020, the advisor stated: "We have done a lot to support families within the National Programme for the Substitution of Illicit Crops (PNIS) [...] This administration has invested \$881,521 million, some USD \$232 million, in

different components in the programme. It is a success" (Archila, 2020). The information in Figure 2 shows that his claim that the programme is a success is untenable.

Just two of the programme's six elements have been implemented so far (community agreements and PAI), and of these, the individual/family PAI, which is the component that has received the most attention, has not been fully implemented after five years of implementation of the substitution programme. The same can be said about the employment opportunities created for harvesters, since barely a third have been linked to the programme as community advisors. In contrast, the level of compliance by those enrolled in the programme is outstanding. Both phases of CPEC's monitoring data revealed that the level of replanting is less than 1% of the hectares it assessed.

Recently, the advisor argued that "a substitution programme is not measured by productive projects, it is measured by the number of families that leave coca and by the number of hectares that are substituted [...] During this government, 18,000 hectares of this disastrous crop have been substituted, which is about 20% of the hectares that we had at the beginning of the government" (Romero, 2021). Nonetheless, these are neither appropriate nor sufficient indicators to measure the implementation of the PNIS. If the evaluation is extended to the level of detail of the indicators in the Framework Plan for the Implementation of the Agreements (PMI) of point 4, the instrument designed to carry out this monitoring, in contrast to the adviser's perception, the outlook does not improve; on the contrary, there are serious breaches of the Agreement with regard to substitution. As Table 3 below shows, beyond the issuing of the regulatory decrees and the continuous delay of individual PAI, there are numerous gaps in the implementation of substantial parts of the programme:

- The law on special judicial treatment has not yet been negotiated in Congress. This omission is a clear breach of the AFP's commitments and puts families who have participated in the programme, and who have handed over their personal information, at legal risk, and yet they have no guarantee that they will not be prosecuted or judged.
- No progress has been made in collective or community-based immediate attention measures. The PNIS includes a series of collective or community-based immediate attention measures, as shown in Table 1. The different sources which have been consulted for this report do not show any progress regarding health brigades, early childhood care or a policy for the elderly.
- The gender and ethnic focus have not been thoroughly adopted or implemented.
- The PISDA and PDET have not been incorporated. So far, the PISDA has involved labelling the initiatives that were proposed in the PDET's participatory spaces which the ART and the Council consider to coincide with the purposes of the PISDA.
- PNIS interventions in environmentally protected areas, national natural parks or forest reserve zones, lack a fully concerted approach with the communities. Furthermore, the few efforts to intervene in these areas through substitution programmes are affected by military operations in these zones.

Table 3. Plan for the Implementation of Agreements (PMI) indicators for PNIS evaluation

Component	Indicators	Overview
PNIS implementation	D.265. PNIS created/implemented D.279. Food assistance and provision D.280. Self-sufficiency and food security projects D.266. Territories with collective agreements D.281. Short-term productive projects D.282. Long-term productive projects D.358/D. G5 Harvesters in rural employment. D.273 Percentage of hectares substituted	<p>The PNIS was created by decree 396 of 2017 and is regulated by decree 362 of 2018, and implementation began in 2017</p> <p>In terms of the individual PAI, the statistics in Figure 2 highlight the substantial delay in the implementation of the productive component, and the lack of implementation of short- and long-cycle productive projects. Likewise, the data in Figure 2 reveals a neglect of harvesters.</p> <p>The final indicator shows the number of hectares that were voluntarily eradicated and the productive projects which have been implemented so far. Given the backlog of productive projects, this represents a non-compliance regarding the hectares substituted. The compliance date for indicator D.273 was 2019.</p>
Territories without illicit crops	D.MT3. By 2022 the territories with PNIS would be 100% free of illicit crops	<p>This indicator has been met thanks to the commitment of the families registered in the PNIS not to replant (Figure 2). In fact, according to the UNODC report on illicit crops (2020) replanting in PNIS areas is barely 7%. However, at the municipal or departmental level, the goal of crop-free territories is far from being achieved.</p>
Special Judicial Treatment	D.267. Document detailing the proposed regulatory adjustments for differential criminal treatment	<p>The law on differential criminal treatment has not been raised in Congress.</p>
Coordination between Point 1 and Point 4.	D.404. Coordination PISDA-PATR D.269 PISDA development	<p>The CPEC (2019, 2021a) and ART report that progress has been made to identify which of the PDET initiatives fulfil the key pillars of the PISDA. However, beyond this, there have been developments to the PISDA recorded, nor adequate coordination. This panorama has already been denounced in the reports of the Comptroller's Office (2020) and the Inspector General's Office (2020). There is no accurate information on how the PNIS delegates participated in the development of the PDET initiatives or the so-called Roadmaps for each PDET. The ART website (consulted October 2021) shows roadmaps corresponding to 9 of the 16 PDET sub-regions.</p>

		<p>According to the CPEC (2021b), 812 initiatives have been selected in this process of "PISDA marking", 282 of which are actively being implemented. It is striking that in the eight municipalities where the PNIS is implemented but not PDET, there are 1444 active interventions, which is greater than all of the initiatives in the 48 municipalities with PISDA-PDET integration combined. This raises inconsistencies about the PISDA-PDET coordination process, as well as in the methodology adopted.</p>
Rural Property Titling	<p>D.393. Regulations for the formalisation of land ownership</p>	<p>Despite the issuing of Decree 902 of 2017, which includes measures for access to and the formalisation of land for PNIS users, the data presented by the National Land Agency is insufficient. According to the ANT, 2382 titles (80013 ha) have been formalised. The Inspector General's Office (2021b), however, states that only 7% of these formalised hectares correspond to the period of the AFP.</p>
Community PAI measures	<p>D. Territories with on-demand health brigades D.277 Early childhood care D.278 Comprehensive policy for the care of older people</p>	<p>During these years of implementation, there is no record of immediate attention measures.</p>
Gender Focus	<p>D.G.1 Gender focus protocol for PNIS implementation D.G.2 Women's organisations involved in agreements with communities D.G.4 Female employment in the public service D.G.12 Women's involvement in productive projects D.G.13. Women's participation in PNIS interventions</p>	<p>The Protocol was to be formulated in 2017. However, it wasn't until 2021 that the ART, the Presidential Office for Stabilisation and Consolidation and the Presidential Advisory Office for Women's Equity issued the gender protocol through Resolution 09 of 2021.</p> <p>The 2019 report on the implementation of the gender focus by the High-Level Gender Body documents the participation of five women's organisations out of the 108 organisations that participated in the collective agreements.</p> <p>There is no accurate information on the participation of women elsewhere. The Presidential Office for Stabilization and Consolidation report (2019) only states that women have participated in these instances.</p>
Ethnic Focus	<p>D.E.2 PISDA with ethnic focus D.E.5 Substitution plans consulted with ethnic peoples D.E. Prior consultation processes in prioritised ethnic territories by 2018</p>	<p>Given the methodology for the development of the PISDAs (identifying the relevant PDET initiatives), it is not possible to verify how this process of consultation with ethnic peoples will be carried out. The roadmaps include a Special Consultation Mechanism (SCM). It is important to explore how the SCM is functioning at the territorial level.</p>

	<p>D.E.6 Ethnic territories rid of anti-personnel mines. D.E.12 Differential criminal treatment of people belonging to ethnic groups</p>	<p>The entire implementation of the PNIS has lacked an ethnic approach and the adoption of differential measures that recognise territorial rights. There has been no prior consultation on how the different components of the PNIS will operate in areas belonging to ethnic peoples.</p> <p>The people registered in the PNIS who belong to ethnic groups have suffered the same delays in the implementation of the programme. The indicator on differential penal treatment has also not been met. The government has formulated a document called Model of Substitution with Legality, which adopts differential substitution measures for ethnic communities. However, it is not yet clear how much progress has been made regarding the consultation and approval of this substitution model with the ethnic authorities.</p> <p>According to CINEP-CERAC (2021), humanitarian demining is a process that advanced in 2018-2019, but for security reasons and the pandemic, the goals could not be met.</p>
<p>Illicit crops in areas of special environmental interest (Forest Reserve Areas, PNN)</p>	<p>D.290. Hectares in PNN under restoration processes D.288 Families in strategic environmental areas with substitution agreements.</p>	<p>This component has made some progress since 2019 in terms of technical documents and intervention pathways. Resolution 56 of 2020 adopts guidelines for substitution processes in environmentally strategic areas. Likewise, in 2019 a guide was adopted for comprehensive technical assistance in PNN areas.</p> <p>According to information provided by the CPEC (2021a), 11,345 families will be assisted under the Territories for Conservation strategy, which proposes some economic alternatives in these areas where PNIS participants are present.</p> <p>However, so far there is no precise information on the alternative productive projects to be implemented. Furthermore, the way in which these productive projects or economic alternatives are being agreed upon is striking; the Inspector General's Office (2021) has denounced that some new operators have ignored the participatory process of the PNIS. In field trips that the Land Observatory team made to Tumaco, it became evident that these plans have not been agreed upon in areas that apparently overlap with the Forest Reserve Zone.</p>

Sources: PMI indicators; Inspector General's Office (2021); CPEC (2021); CINEP-CERAC (2021).

In light of this data on the status of the programme's implementation, and the findings of the Land Observatory's survey of PNIS users in Tumaco (see above section on data and

sources), we have identified the following findings regarding the programme's implementation, which will be further developed in this report.

- Firstly, the substitution programme has not been the main strategy for tackling the problem of illicit crops. Manual eradication and land spraying operations have continued during these five years, to the detriment of the willingness of peasant and ethnic communities to substitute. This situation is a clear breach of the AFP. Failing to prioritise substitution and limited efforts to implement the different components of the PNIS have been evident during the Duque government.
- Second, the incomes of families enrolled in the PNIS have seriously deteriorated under the agreement. Contrary to the fundamental objective of the PNIS, which is to overcome the inequality and social exclusion that affect illicit crop production, the programme has exacerbated conditions of poverty among families who enrolled. This is due to continued non-compliance with basic components of the programme. Under current conditions, substitution is simply not sustainable.
- Thirdly, the PNIS has generated systematic exclusions against the very population that substitution is intended to benefit. The lack of coverage of the programme in areas and municipalities where collective agreements were signed, as well as the continuous cases of suspensions and arbitrary withdrawals of registered families, bear witness to this trend.
- Fourthly, the PNIS has placed the leaders who promote and coordinate the programme at high risk. The lack of security guarantees has deteriorated and prevented social organisations from participating in the programme's bodies at the different territorial levels where they operate.
- Fifth, the PNIS has been affected by delays in the implementation of point 1 of the Comprehensive Rural Reform (RRI). The lack of progress made regarding access to land, the social organisation of property, and the development of PDET initiatives, among others, affects the sustainability of substitution.
- Finally, the PNIS is underfunded. Over the course of its five years of implementation, the government has cut funding for the PNIS year after year. Of course, the lack of resources means that many of the programme's basic components are not being met.

The coexistence of substitution and forced eradication is a breach of the Peace Agreement

The Agreement introduced a new anti-drug approach based on a sequencing of policies, where voluntary substitution takes precedence over forced eradication (manual, aerial and ground spraying). It requires the state to make every effort to implement, first and foremost, substitution efforts, turning to forced eradication only as a last resort. Additionally, the Constitutional Court in its ruling C-630 of 2017, emphasised the State's duty to implement and comply with the peace agreement as government policy. In light of this, all public institutions have a duty to prioritise the substitution programme as the first step.

Despite this, voluntary substitution was not the first measure to be introduced during these initial five years of the Agreement's implementation. As we have highlighted in other reports (Machuca & Triana, 2021), voluntary substitution has been confronted with forced manual

eradication and aerial spraying operations constantly, ever since the beginning of PNIS implementation. Since 2017, confrontations have occurred between peasant farmers awaiting the implementation of the programme - some of these communities had already signed up to collective agreements - and the security forces, the police or the army, whose aim is to forcibly eradicate illicit crops. This juxtaposition of strategies has led to a lack of prioritisation of substitution efforts, which has been reflected in several actions carried out by the State during both presidential terms (Santos and Duque).

Firstly, the Santos government continued to promote both substitution and eradication and issued guidelines to regulate both strategies. In February, Santos issued a decree which contracted the National Police to forcibly eradicate (Decree 249 of 14 February 2017), which was approved prior to the decree creating the PNIS (Decree 896 of May 2017). The implementation of Decree 249 was rejected by FARC delegates, who at the time claimed that it generated a scenario of mistrust in the run-up to the start of the substitution programme (Acero & Machuca, 2021).

During Santos' mandate, the combination of both strategies led to continuous confrontations between the security forces and the peasants, as well as a lack of coordination between the agencies in charge of substitution and the security forces. Various social organisations have denounced this situation. In 2017, in Antioquia, some peasants demonstrated against the forced eradications carried out by the army. The organisations stated that the army would not stop eradicating "until the FARC surrendered their weapons" (Asocurn, 2017). In El Retorno, Guaviare, other organisations denounced the sabotage of substitution by the police. According to the coca growers' committee created to assist with coordination of the PNIS, the police insisted that "if peasants in this region were waiting for the government to comply, this was wishful thinking" (Guaviare, 2017).

This confrontational situation put not only substitution but also the implementation of the Peace Accord in Tumaco in a precarious position very early on. On 25 February 2017, the National Coordination of Coca, Poppy and Marijuana Growers (COCCAM) expressed its rejection of the actions committed by anti-riot squads and the army against farmers in Tumaco who were awaiting the substitution programme. Their statement said, "the government must immediately suspend the violent, repressive and desperate eradication actions that seek to reduce the area cultivated with illicit crops and acknowledge that these actions do not resolve the situation of thousands of peasant families" (COCCAM, 2017a).

Confrontations worsened in Tumaco after the signing of collective agreements in Nariño (4 March 2017), which proposed voluntary substitution for all municipalities in the department. Between 22 and 24 March, the Anti-Narcotics Directorate of the National Police resumed forced eradication operations in several villages in Tumaco. This prompted the mobilisation of peasants who rejected the operations and demanded respect for the collective agreement. The confrontations between peasants and the security forces continued on 27 and 29 March, on the main road between Tumaco and Pasto, in Llorente and La Guayacana (COCCAM, 2017b).

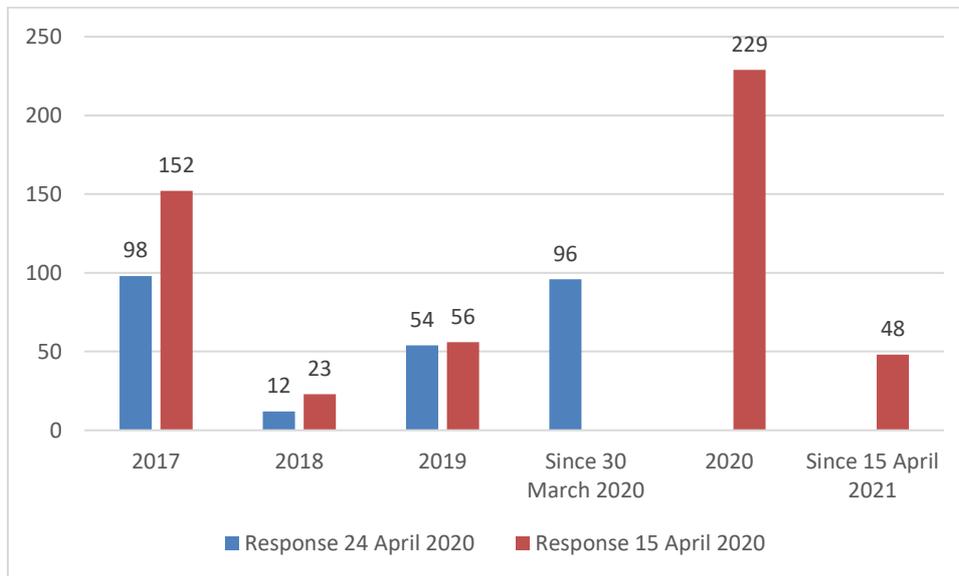
In April 2017, these confrontations continued. On 6 and 7 April, "the following events occurred [sic] in the neighbourhoods El Progreso 115, and Kilometre 85, on 6 April in the

afternoon, where [sic] several people were injured and machinery was set on fire. In addition, they were warned that if they opposed eradication efforts, they would be shot in order to revenge the events that had occurred previously in Llorente" (Veredas Tumaco, 2017). On 11 April of the same year, peasant organisations and community councils in Tumaco declared themselves a Permanent Assembly. In a statement, they reaffirmed their commitment to substitution, rejected the violence against the demonstrations and demanded the release of people detained on 8 and 10 April by the National Police (COCCAM et al., 2017).

The confrontations between the peasants and the security forces in Tumaco culminated in the tragic event of the Tandil massacre, which has been reported in the media as the first massacre to occur during peacetime. On 5 October, in the midst of a confrontation between the security forces and peasants who were trying to prevent eradication through a humanitarian siege, the National Army attacked the demonstrators and left an undetermined number of people dead and wounded (according to different sources, between 6 and 15 people are said to have been killed) (Verdad Abierta, 2017).

Similar events to those in Tumaco have occurred in different parts of the country throughout the implementation of the PNIS. In this regard, the Land Observatory built a database to record these confrontations during forced eradication. Between 2017 and 2020, "we recorded 95 incidents between peasants and state forces. These incidents have occurred in 11 of the 32 departments of the country [...] Norte de Santander, Putumayo, Nariño and Antioquia register 71 cases (around 76%)", the use of firearms by the public forces has been registered in 20% of the cases, 19% involved injuries, and 6% of the cases involved the death of at least one person (Machuca & Marín, 2020). These records are complemented by National Police figures on community "corralling" of forced eradication efforts. Figure 3 presents data provided by the National Police in two responses to freedom of information requests, and shows that there was a significant increase of such blockades in 2020, precisely in the midst of the Covid-19 pandemic.

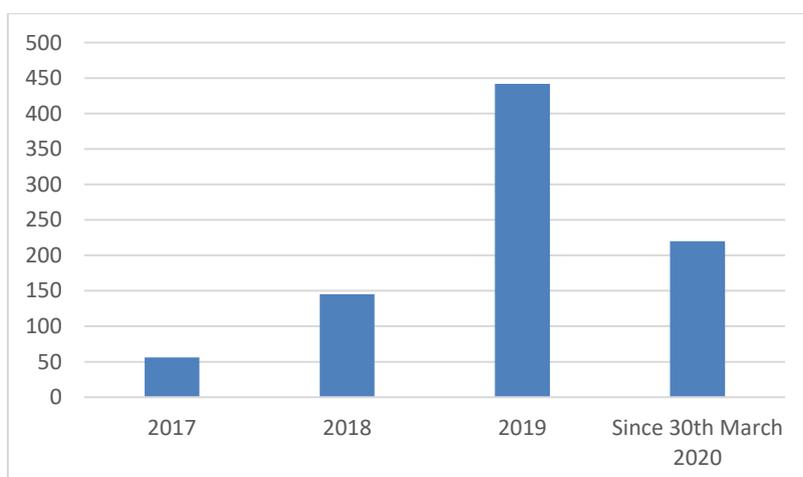
Figure 3. Community blockades in the face of forced eradication (2017-2020)



Source: Machuca and Triana (2021). Data obtained by a freedom of information requests to the National Police S-2020-/ARECI-CASEG 29.25, 24 April 2020, and UNDES-CASPE - 29.25, 15 April 2021.

The lack of coordination between substitution and eradication efforts and confrontations between peasants and security forces, occurs in a context where eradication has been promoted to the detriment of substitution efforts. Throughout the PNIS implementation, the number of contracted mobile eradication groups has steadily increased, as shown in Figure 4.

Figure 4. Mobile eradication groups (2017-2020)



Source: Machuca & Triana (2021). Data obtained from a freedom of information request to the National Police S-2020-/ARECI-CASEG 29.25, 24 April 2020

During the Duque government, non-compliance has worsened

The occurrence of both substitution and forced eradication during Santos' administration violated the sequencing of interventions which was established in the AFP. Even so, it is important to recognise that at the time, the programme's implementation was gaining momentum, and aerial spraying with glyphosate was kept at the margins of anti-narcotics policy under Santos. Non-compliance with the PNIS has become even more acute with Duque's government, not only because of the continued disregard of the AFP, but also because of his explicit intentions to resume aerial spraying.

During Duque's term in office, this disregard for the sequencing established in the AFP has continued. Clashes between security forces and peasants have not ceased. On the contrary, as Figure 3 shows, in 2020, the year of the pandemic, the highest number of community blockades of eradication operations was recorded. Recent figures provided by the National Army to the media could indicate a gross underestimation of the dimensions and effects of these blockades or confrontations between the security forces and communities. According to the army, 1050 blockades were reported in 2020, the departments with the highest number of incidents were Putumayo (276), Nariño (247), Norte de Santander (223), Caquetá (94), Antioquia (76) and Cauca (21) (El Tiempo, 2021a). According to the army, 1017 blockades were registered in 2021 (El Tiempo, 2021b).

In late 2021 there were continuous clashes over forced eradication operations in different parts of the country. Events that occurred in Anorí, Antioquia, in the neighbourhood of Tenche, in October 2021, are particularly noteworthy. Several videos record uniformed men intimidating peasants and firing shots into the air (Vasquez, 2021). In Tibú, Norte de Santander, the situation was even more delicate. In the midst of the operations, peasants corralled the military, preventing them from carrying out eradication (Revista Semana, 2021). The confrontation rapidly escalated to the point that community leaders in the territory were accused of kidnapping by different authorities, including the national government (Organizaciones Sociales del Catatumbo, 2021).

Despite the fact that court orders have denounced the breaching of the sequencing of PNIS implementation strategies, the government insisted on maintaining forced eradication. In 2020, the Administrative Court in Cauca acknowledged that the National Army and the Territorial Renewal Agency had violated the sequencing of interventions which is built into the Agreement, which is why it ordered the suspension of forced eradication in three municipalities in Cauca (in Caloto, Cajibío and Piamonte). The Court ruled as follows:

This court concludes that the due process of the peasantry in Cajibío, Caloto and Piamonte was indeed violated when the National Army proceeded to forcibly eradicate illicit crops without attempting to voluntarily substitute the crops, and without carrying out a process of socialisation and dialogue with the communities, which also implies that their rights to information and participation have been ignored. This is an unfortunate sign of the State's non-compliance with point 4 of the Final Peace Agreement (Sentence of 18 August 2020, Case 19001-33-33-004-2020-00067-01 of the Administrative Court of Cauca).

The Administrative Court in Nariño also suspended forced eradications in the municipality of Ancuya. In this case, the Court emphasised the prioritisation of strategies established in the Final Peace Agreement and stated the following:

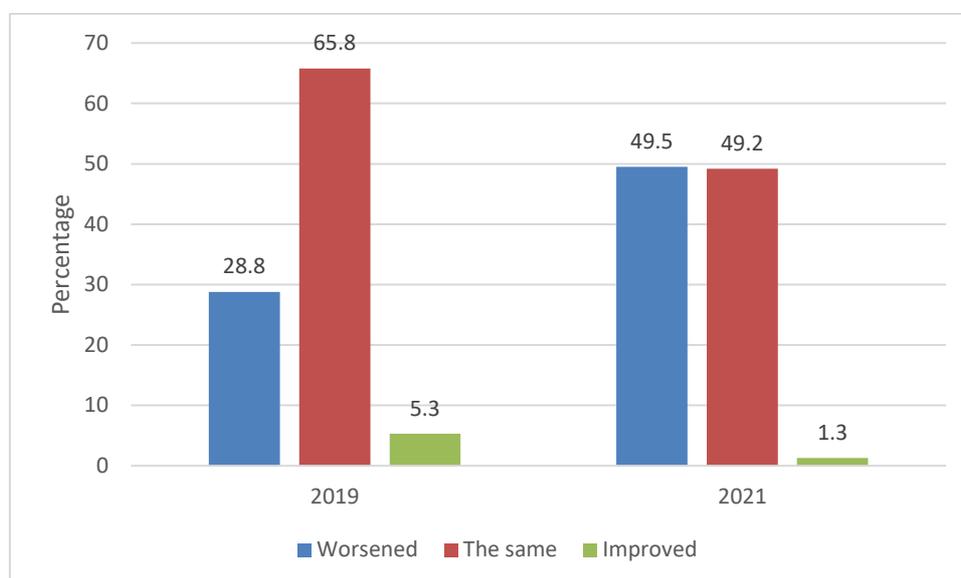
Bearing in mind that the Final Agreement prioritises voluntary substitution over forced eradication, the Comprehensive National Programme for the Substitution of Illicit Crops must be continued, especially considering that the community has already expressed its willingness to take part in these programmes. The Programme must deliver its commitments to the communities. Therefore, it is unacceptable that forced eradication is carried out in communities that have not been sufficiently consulted about voluntary eradication. Nor should forced eradication take place in communities that wish to be included in the voluntary eradication process, but have not yet enrolled due to the fact that registration is currently not available. It is contradictory to advance forced eradication when, according to UN and ART reports, the results of voluntary eradication have been favourable. (Sentence 14 September 2020, File 52-001-3333-009-2020-00064 - 01 (9276) Administrative Court of Nariño).

As well as failing to comply with the terms of the AFP, the Duque government has gone even further in its multiple efforts to resume aerial spraying with glyphosate (Justicia, 2018). In doing so, the government has faced multiple challenges and has had to negotiate with the environmental and health authorities and the bodies that coordinate anti-narcotics policy in order to meet the requirements imposed by the Constitutional Court. As pointed out in a previous Land Observatory report (Machuca and Triana, 2021), resuming aerial fumigation would contradict the hierarchy of implementation strategies designed in the Peace Agreement.

The actions taken by the Duque government have been detrimental to the implementation of the PNIS during his administration. There are two additional facts that further explain the government's neglect of the programme: firstly, the agencies in charge of the PNIS have reiterated their refusal to open up registration for people who were initially left out of the programme, including in regions where there are existing collective agreements (El Nuevo Siglo, 2021; Región, 2019). Secondly, the government has promoted new substitution strategies that are beyond the participatory design of the PNIS, and do not yet have a budget allocated for their implementation (Presidential Office for Stabilization and Consolidation, 2020).

This impact of the Duque government on the PNIS implementation is felt heavily by those enrolled the programme: the survey conducted in Tumaco revealed that 49% of respondents felt that implementation had worsened under the Duque government, while a similar percentage (48%) felt that it had remained the same. When the question was asked to the 165 people who responded in both 2019 and 2021, the results indicate that their perception of the government's attempts to implement the PNIS had worsened. In 2019 only 28.8% of respondents said that implementation had worsened during the Duque period, in the 2021 survey this figure increased to 49.5% of respondents.

Figure 5. Opinions on the PNIS programme under the Duque government



Source: 2021 survey

The PNIS has substantially decreased household incomes

The results of the 2019 survey were already showing indications of the economic sacrifice that families enrolled in the PNIS were making in order to remain within the programme: giving up illicit crops as a source of income coupled with the lack of deliverance of the substitution programme had seen a substantial reduction in the resources available to many families. This decrease was especially significant for coca growers. The following figure shows that coca growers had a loss of almost \$910,000 pesos.

Table 4. Income before and after the PNIS

Profile	Average income before entering the PNIS	Average income one month ago	Average difference
Growers	1,649,321	739,879	-909,441*
Harvesters	669,177	1,080,230	411,052*
Share-croppers	623,631	768,507	144,875

* 5% statistically significant

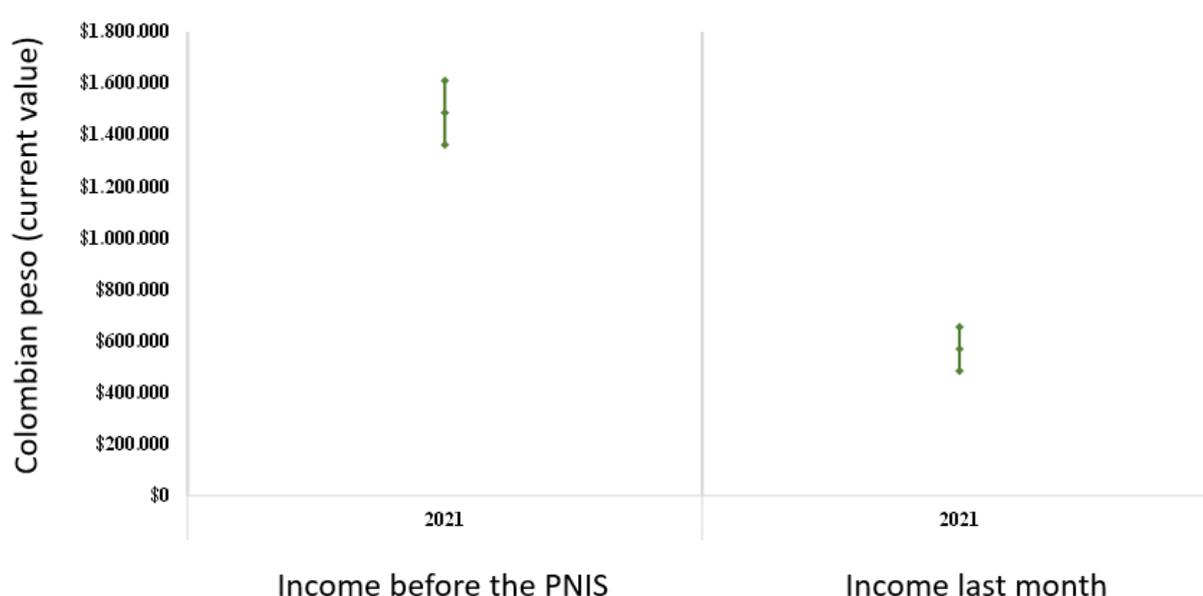
Source: 2019 survey (Marin et al, 2019)

The sharp reduction in the incomes of families registered in the PNIS is unexpected and alarming. No substitution programme is sustainable in such a scenario. Unfortunately, the

2021 survey reveals that incomes continued to fall. Given the context of non-compliance and delays in the implementation of the programme, the families enrolled have not had a sustainable source of income since they eradicated their illicit crops. As Figure 2 shows, there was a delay in the short- and long-term productive projects which lay the foundations for families to obtain their income through legal means. The survey results show us, from different points of view, this decline in income.

Initial findings show the difference in income of the total number of respondents (413) before the PNIS and subsequently in June 2021. Income before entering the PNIS was COP1,486,000, compared to an average income of COP570,000 in June 2021, as shown Figure 6.

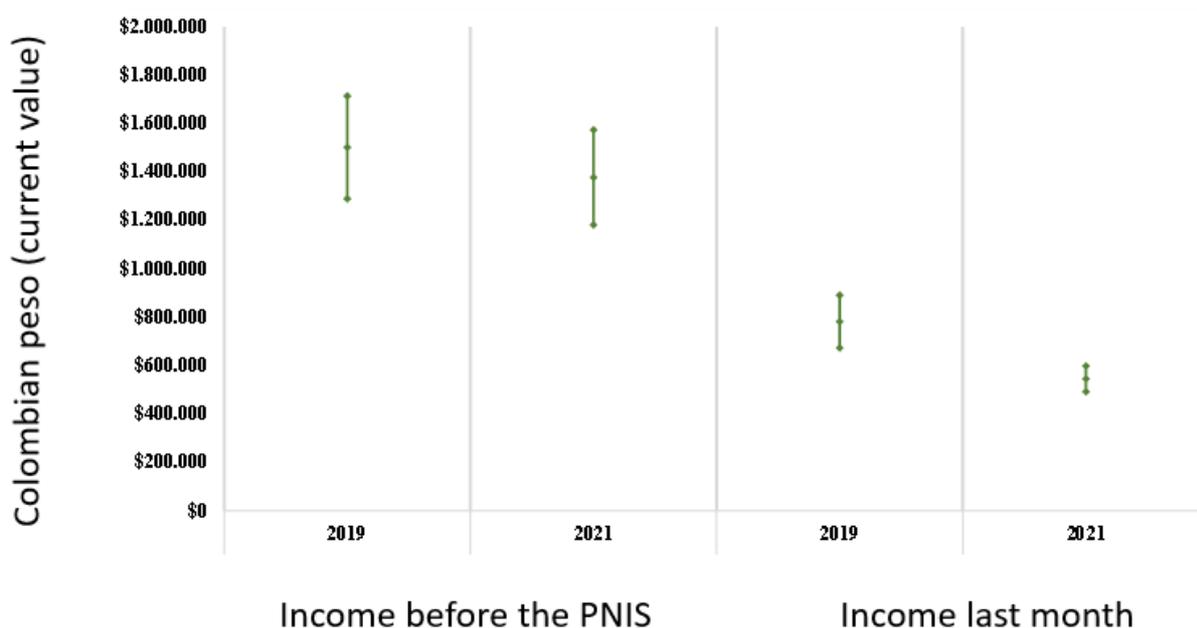
Figure 6. Estimated income before and after the PNIS, 2021 survey



Source: 2021 survey

If we take the 2019 survey respondents as a reference, by 2021 the decrease in income before and after the PNIS and between the periods 2019 and 2021 is even more evident. We observe how each assessment (in 2019 and in 2021) showed that income not only decreased, but it also became more concentrated in a smaller income range, i.e. the income recorded by respondents shows less variability, which decreases the possibility that they could be earning higher incomes outside these average ranges.

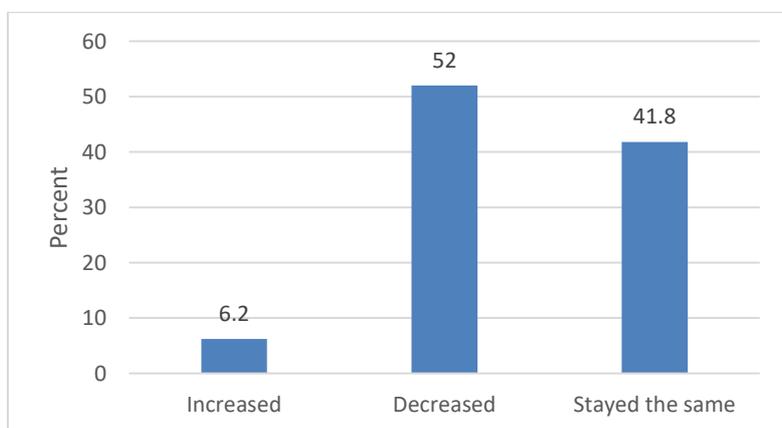
Figure 7. Estimated income before and after the PNIS, 2019 and 2021 surveys



Source: 2021 survey

From a subjective point of view, respondents were asked whether they felt that their income had changed upon entering the programme. We found that 52% of respondents felt that their income had decreased while 42% responded that it remained the same, as shown in Figure 8.

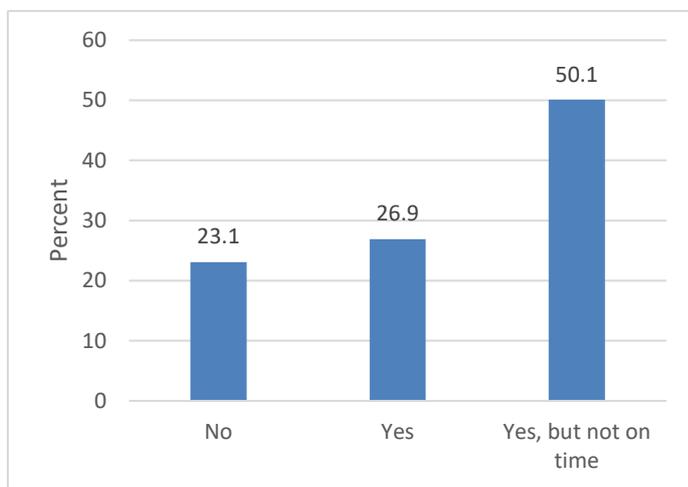
Figure 8. Has income increased, decreased or stayed the same since the PNIS?



Source: 2021 survey

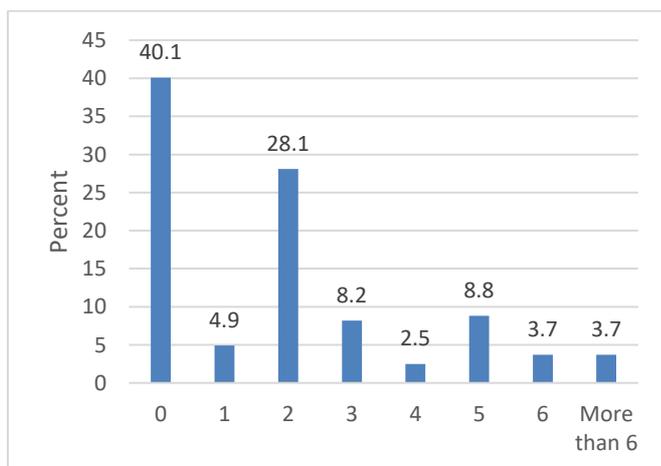
As mentioned above, these conditions have been caused by non-compliance with the PNIS, and particularly with the individual/family PAI. Data collected in the survey supports this finding. With regards to the food assistance payments, the majority of respondents said that they had received them, but not on time (Figure 9), while 60% of respondents stated that they were still owed payments (Figure 10). In contrast, official data on implementation in Tumaco suggests that about 75% have received their payments in full, while the rest are still owed payments or have not received any payments at all (Figure 11).

Figure 9. PNIS payments received



Source: 2021 survey

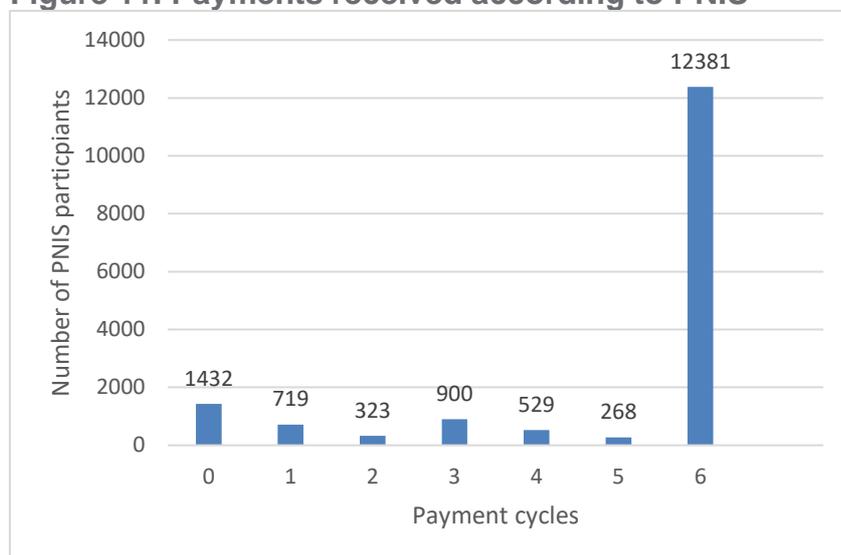
Figure 10. Number of payments owed



Note: A small percentage of people responded that they were owed more than six payments

Source: 2021 survey

Figure 11. Payments received according to PNIS



Note: If people are in payment cycle 6, it means they have received all of their payments; if they are in cycle 5, it means they are owed one payment; in cycle 4, they are owed 2 payments, and so on.

Source: Own elaboration based on data obtained via freedom of information requests on 15 June 2021, from the Territorial Renewal Agency under file No. 20212300083661.

The delay in payments became not only a clear sign of non-compliance, but also an important reason for families' discontentment with and rejection of the programme. In 2019, one user commented: "When they came, (they said) well, we had to eradicate coca. What did we do? We eradicated it and now we are here. Because up until now they haven't given me a single payment" (PNIS participant in Tumaco, 24 February 2019). In another interview we were told: "They don't give you results. The United Nations came and made us pull out our crops, and in my case, for example, they made me eradicate my crops and when it was time to pay me, they didn't, I don't know why" (PNIS participant in Tumaco, 26 April 2019). In a meeting with people enrolled in the PNIS in one of the neighbourhoods in Tumaco where the programme got going early on, we heard the following:

Interviewer: Was that first payment honoured?

Interviewee: Everyone received the first payment. By the second payment you needed to have eradicated your crops. They checked whether or not people had done so.

Interviewer: Did you get the second payment?

Interviewee: The second payment went well, but by the third payment it started to take 3, 4, 5 months to come through (meeting with PNIS participants, 2 July 2019).

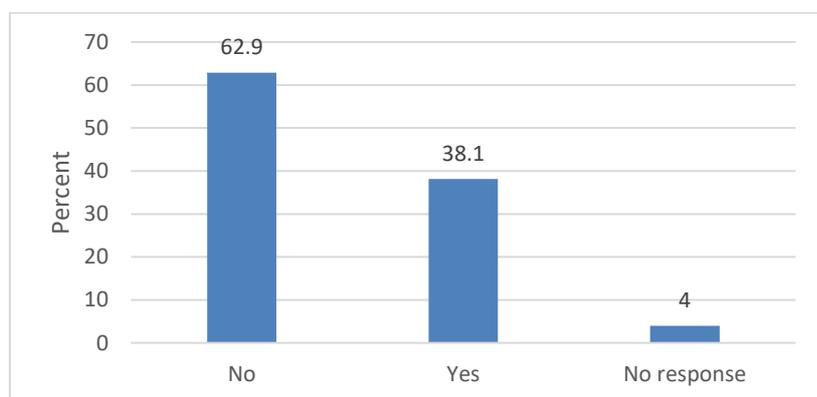
One peasant leader, who has been a staunch defender and promoter of substitution in Tumaco, told us about a complaint he had made to Archila on this issue:

There was a time when payments were delayed for five months, you must have heard about it. [...] One time, Archila came [...] I said, excuse me, on behalf of the communities who trust in me and who have made me the spokesperson to express our dissatisfaction

with this programme, I am going to ask you a question and I hope you answer it at once. The question goes to you and to all the authorities and all of your colleagues here [...] do you go to the market every four months, every five months, every month, every fifteen days or every eight days? I asked the question. I looked around. Nobody raised their hand [...] It has been eight months since we pulled up our bushes, and we have not received what the government promised, is that fair? (Peasant leader Tumaco, 23 May 2021).

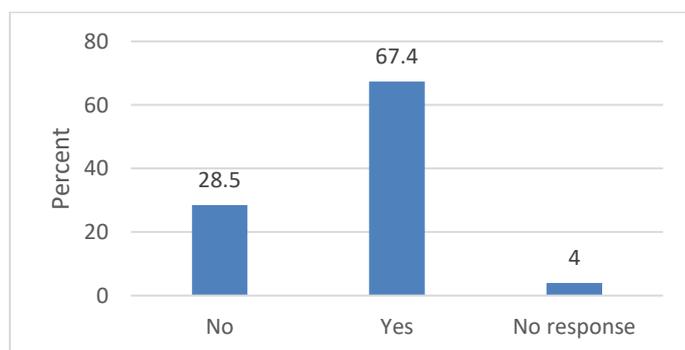
As we have described elsewhere (Gutiérrez et. al, 2019), delays in payments were also caused by difficulties in the verification process, which was carried out by UNODC. The second payment was delayed because of the time it took to verify the eradications, which depended on this activity. On other occasions, the verification process produced inconsistencies which led to so-called suspensions (see next section). Farmers who were suspended had their payments from the programme stopped until the situation was resolved. In terms of technical assistance and food security projects, respondents stated that they had not received technical assistance, but they had received food assistance.

Figure 12. Technical assistance received



Source: 2021 survey

Figure 13. Food security resources received



Source: 2021 survey

Although those surveyed did claim to have received this assistance, complaints were made in interviews about the quality of the goods and the lack of possible markets in which to sell produce. In a discussion with participants in a neighbourhood in Tumaco, one person reported the following:

They told us that they were going to pay us every two months, and this went on for 4 or 5 months. They stopped paying a million per month, but there are people here who are still owed. The programme that came from the project, the 1.8 million, was a total loss, can you imagine. They brought in a lot of chickens, but they were of poor quality, and they died. People asked for soya feed, and they were given another kind of feed. So, no... (PNIS participants' meeting, 2 July 2019).

Elsewhere in Tumaco, a leader told us about a lack of coordination regarding the delivery of these projects.

For example, you might ask for 30 chickens, but you only get 15. We divided the 1.8 million to buy chicks in Tumaco, to raise 20 chicks on the farm, you know how much a chicken is worth, how much a bag of purine is worth, and when you use the calculator you realise: what are they actually giving us? Four hundred thousand pesos, five hundred thousand pesos – what about the rest? So, it's a total waste [...] They gave chickens, pigs, and wire and vitamins for the cattle. But in reality, for example, my father asked for cattle, but he got a hand pump, two bags of fertiliser and two bags of lime, nothing else. So where did that 1.8 million dollars that was given to the project go? (Lideresa Tumaco, 21 May 2021)

Some fish farming projects in Tumaco have been received relatively favourably by participants, however the lack of support from the state towards these people is evident:

Interviewer: What projects did you ask for?

Participant: In fish farming

I: And how has that been going?

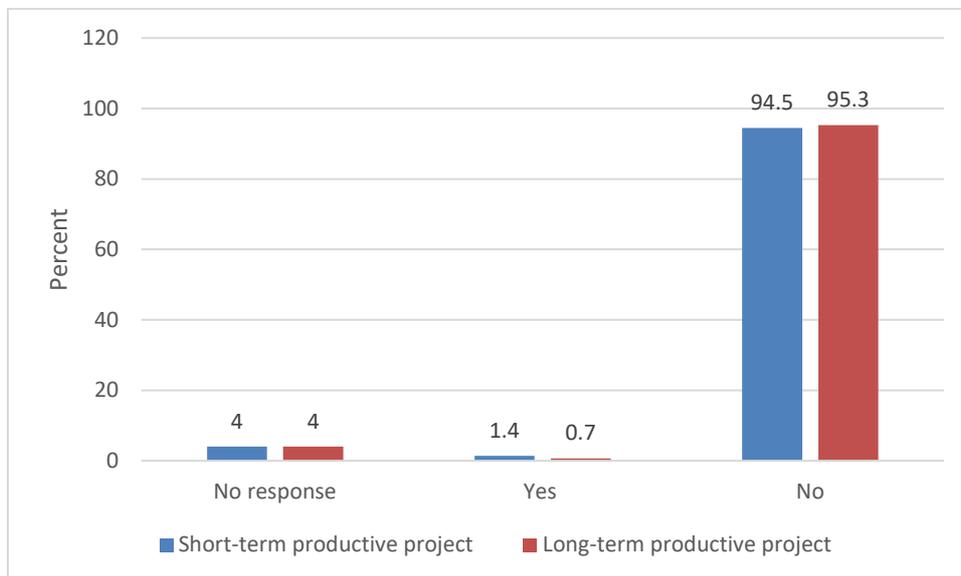
P: Well, we still have the fish, we have already harvested the first crop, now, God permitting, we will harvest the second in 2-3 months. The resources are coming in, but sometimes we don't have anyone to sell the fish to and we are producing a lot of fish, so we have a lot to offer.

Participant 2: Look, it took us a really long time to finish a pool, they promised us that they would find us a place to transport [the crop] and it never arrived.

P: We can't store it properly, we don't have big freezers to be able to take out say 500 kilos and freeze them, we have to go door to door instead. (PNIS users meeting, 26 May 2021)

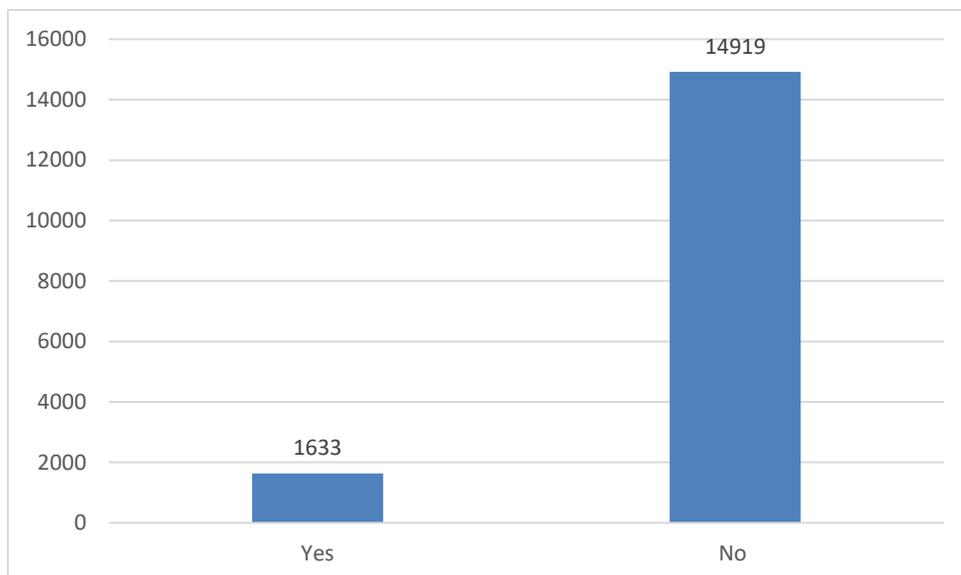
Just as the official figures regarding implementation of the programme show, the majority of people surveyed in Tumaco have not received their short- and long-term productive projects. According to the official data, little over 1,600 people (out of the 16,000 registered) in the programme in Tumaco have received their short-term productive project, while there is no official information with regarding progress made on the long-term project.

Figure 14. Resources received for short- and long-term productive projects



Source: 2021 survey

Figure 15. Short term productive projects in Tumaco according to PNIS



Source: Authors' own elaboration based on data obtained from a freedom of information request on 15 June 2021 to the Territorial Renewal Agency, No. 20212300083661

Systematic exclusion and barriers to accessing substitution

At various stages of PNIS implementation there have been unjustified exclusions of individuals and entire communities who have expressed their willingness to substitute illicit crops. The first exclusions occurred during the registration phase of individual agreements:

half of the families registered in the collective agreements were left out of the programme. According to the CPEC, 106 collective agreements were signed in 98 municipalities, which included 188,036 families, but only 99,097 individual families in 47 of the 98 municipalities with collective agreements ended up being enrolled in the PNIS (currently there are 56 municipalities where the PNIS is in place; however, there are municipalities that do not have collective agreements, but do have individual sign ups). The following table shows the number of families covered by the collective agreements versus the number of families who obtained their individual agreement.

Table 5. Collective agreements and individual family agreements

Department	Municipalities	Collective agreements	Neighbourhood	Estimated number of families	Estimated number of hectares	Families with individual agreements
Antioquia	7	7	306	15,437	18,099	11,777
Arauca	1	1	41	680	506	496
Bolívar	13	7	276	5,376	5,910	2,754
Caquetá	14	15	882	20,107	13,153	12,951
Cauca	14	11	343	35,315	25,796	5,685
Chocó	5	5	179	11,246	8,688	-
Córdoba	4	4	173	7,655	7,469	5,996
Guanía	-	-	-	-	-	27
Guaviare	4	7	232	10,030	8,254	7,251
Meta	7	8	337	12,067	7,872	9702
Nariño	18	31	888	66,444	61,153	17,235
Norte de Santander	2	2	4	235	7,000	3,000
Putumayo	1	2	10	500	297	20,331
Valle del Cauca	7	5	82	2,586	2,120	1,066
Vichada	1	1	32	358	458	826
Total	98	106	3,785	188,036	166,774	99,097

Source: Presidential Office for Stabilization and Consolidation (2019)

In addition to the alarming rates of exclusion and suspension, it is concerning that the Duque administration, through the Territorial Renewal Agency and CPEC, has made the collective agreements and individual agreements binding for families registered in the programme, but not for the government. The aforementioned report by the Presidential Office for Stabilization and Consolidation (2019) states that these collective agreements are instrumental agreements of law that do not generate legal obligations for the State.

According to Valencia and Triana (2021), these "covenants", a concept that otherwise comes from a foreign legal framework, would be transgressing the Constitutional Court's interpretation of the State's obligation to comply with the Peace Agreement in good faith (ruling C-630 of 2017). The authors also highlight that, in Colombian administrative law, collective and individual agreements could be interpreted as consensual administrative acts, which require citizen participation for their enforcement.

Beyond this legal debate, it is problematic that the state promotes a substitution programme, with explicit commitments for public institutions and farmers, and then denies the binding nature of such agreements (at least those which it has responsibility over). It seems that the agencies and officials in charge of the programme do not consider the political costs of non-compliance at this level. The implementation of the peace agreement and the PNIS implied a new relationship between the state and its institutions with the communities whose livelihoods depend on illicit crops. It was hoped that trust between the state and citizens would improve, something which has been seriously affected by forced eradication. What are the implications of non-compliance on state legitimacy? State institutions seem to be willing to assume such costs.

Other exclusions within the programme have had significant impacts for families who have formally enrolled in the PNIS - in particular, the arbitrary suspension or expulsion of many families from the programme. The Presidential Office for Stabilization and Consolidation describes the state of suspension in the following terms:

The suspended status in the PNIS refers to a temporary situation in which the household or beneficiaries - for reasons defined in the programme protocol - present inconsistencies or an alleged breach of their commitments or requirements, and therefore they cannot enjoy the benefits of the programme, until each situation is resolved. (Response right of petition to the Presidential Office for Stabilization and Consolidation. OFI19-00124662 / IDM 1207004 of October 28, 2019).

Suspension is a temporary status, which occurs due to an "alleged" non-compliance or inconsistency in the information reported. The requirements that should be taken into consideration for this type of process ought to be based on the programme's regulatory instruments: decree 896/2017, the collective agreements and the individual forms for both growers and non-growers and sharecroppers. In light of these regulations and documents, Table 6 presents the requirements and main commitments of the families enrolled in the PNIS.

Table 6. Commitments of PNIS participants

Regulation	Type of commitment	Description
<p>Decree 896 of 2017</p>	<p>Commitments made by families to voluntary substitution, to refrain from replanting and the other activities associated with illicit crops.</p>	<p>Art. 6 PNIS beneficiaries: the beneficiaries commit themselves to the substitution of illicit crops, not to replant, not to be involved in work associated with these crops and not to have sewn seeds after 10 July 2016.</p>
		<p>Art. 7 Paragraph 2: The agreements signed within the framework of the PNIS formalise the commitments made by communities to voluntary and concerted substitution, to refrain from replanting, cultivating or being involved in work associated with illicit crops or participating in the illegal commercialisation of raw materials derived from them.</p>
<p>Collective agreements</p>	<p>Collective commitments to substitution and refrainment from replanting crops.</p>	<p>The majority of the Collective Agreements contain the following commitment: "The communities express their commitment to voluntary and concerted substitution, to refrain from replanting, a full commitment not to cultivate or be involved in work associated with illicit crops or to participate in the illegal commercialisation of the raw materials derived from them."</p>
<p>Individual</p>	<p>Administrative requirements</p>	<ol style="list-style-type: none"> 1. To be of legal age with an original and valid citizenship card. 2. Recognised by the community assemblies as harvesters who live and/or work in the territory. 3. In the case of sharecroppers, land must be registered for the implementation of their productive activity. The document relating to the land must contain the name of the village or collective territory and the municipality where the registered land is located. 4. No pensioners, no local politicians, no employees of the national, departmental or municipal government. 5. A person can only be the holder or beneficiary for one family unit.

	Commitments to substitution and to refraining from replanting crops.	<ul style="list-style-type: none"> - To remove illicit crops at their roots. - Allow the verification of eradication to take place. - Refrain from replanting. - Attend scheduled PNIS meetings. - Provide truthful information required by the programme.
--	--	---

Source: Authors' own elaboration based on decree 896 of 2017, collective agreements and individual questionnaires.

According to our fieldwork observations and time spent with some of the families who have been suspended, the problem with these suspensions is that they are not caused by serious non-compliance with the programme; on the contrary, the suspensions are motivated by circumstances that, in our opinion, can be resolved without necessarily withdrawing the benefits (payments and other assistance) from the families enrolled. For example, a large number of people have been suspended because they did not have valid insurance (SISBEN) at the time of their enrolment into the programme. In fact, some of the reasons invoked to suspend users from the PNIS were not previously established in any of the rules governing the programme. In Tumaco, the grounds for suspension include: having registered with the wrong profile, which can occur due to a lack of information available, or an involuntary error made by the officials in charge of registration; having belonged to previous substitution programmes, such as Forest Ranger families (familias guardabosques); having paid social security contributions at some point during the implementation of the programme. Other grounds for suspension are described in Table 7.

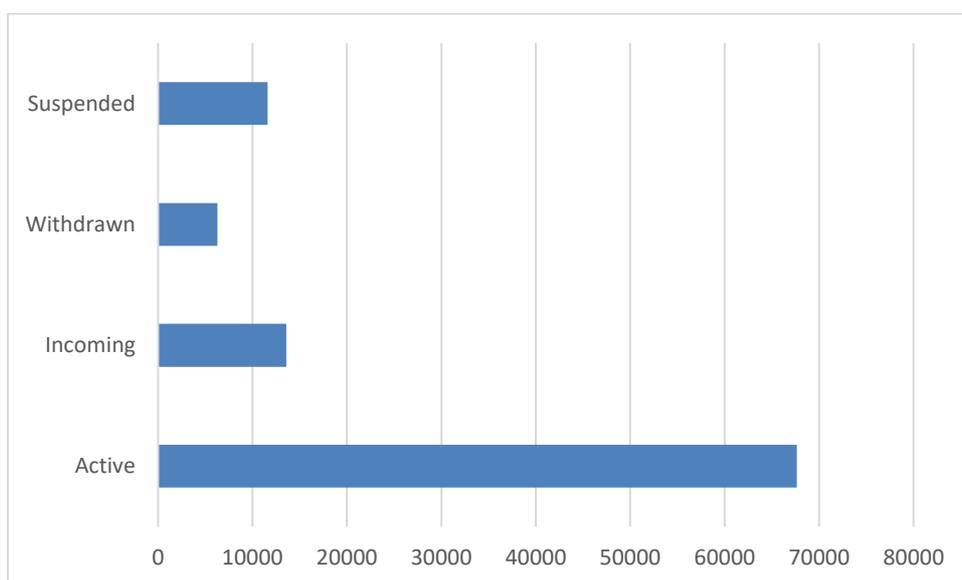
Table 7. Reasons for suspension

Reason for suspension	Description
Territorial monitoring: non-compliance with requirements and/or commitments.	This happens when the person signed up to the PNIS does not meet all of the necessary requirements and/or commitments.
Wrong activity	This occurs whenever someone is enrolled with the wrong profile, for example, he/she registered as a grower although they are not in fact a grower.
Double inscription	People who are enrolled in their capacity as proprietor and at the same time as beneficiaries.
Partial eradication of crops	This occurs when an inspection reveals that not all the crops have been eradicated
Non-compliance	This occurs when an inspection reveals that a beneficiary has not complied with their commitments to the programme.

Source: Gutiérrez et al. (2019). Data collected from the response to a freedom of information request to the CPEC OFI19-00098837 / IDM 1207004 del 28 August 2019).

Suspension from the programme is not a minor issue. Data collected by the Presidential Office for Stabilization and Consolidation in September 2019 indicates that around ten thousand families were suspended while a further six thousand had been removed from the programme completely. Figure 16 shows this information on a national level.

Figure 16. Active, incoming, withdrawn and suspended PNIS users

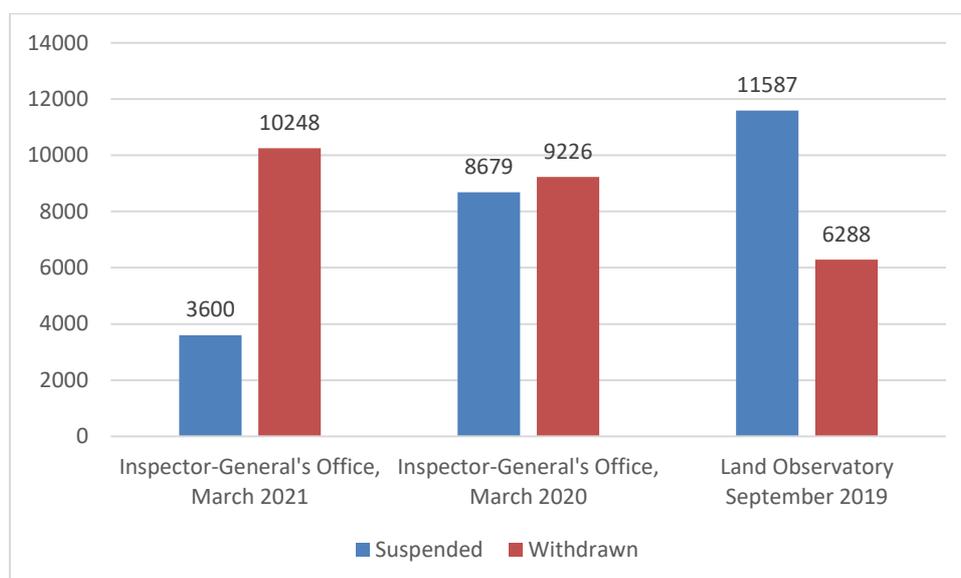


Source: Gutiérrez et al (2019). Data collected from: OFI19-00124662 / IDM 1207004 from the CPEC, 28 October 2019

The other problem encountered is the way that suspensions are being carried out by the Presidential Office for Stabilization and Consolidation and the Territorial Renewal Agency. Our fieldwork revealed that suspension processes have violated participants' right to due process. We recorded improper ways of notifying users of their current status in the programme. There have also been difficulties regarding access to information and evidence available to participants about their suspension in order to launch a defence. These omissions and violations of the rights of the families demonstrate the lack of clear criteria and guidelines for dealing with suspensions. The 2021 report by the Inspector-General's Office draws attention to the high degree of discretion that the ART has when determining a participants' status and deciding whether they can return or will be withdrawn completely. It indicates that, according to the information collected, the main cause of suspension as of March 2021 was the low density of illicit crops in the area. As shown in Table 6, there is no minimum area of illicit crops required by the programme, nor does low density of crops become non-compliance on the part of the family enrolled in the PNIS. In fact, this point is contradictory to the very design of the programme, as it would exclude those who are enrolled as sharecroppers.

The contrast between the Land Observatory's data obtained in September 2019 and that of the Inspector-General's Office (2021) is also striking. The Inspector-General's Office (2021) highlights the plan of action developed by the ART to deal with the requests made by those suspended during 2020. This plan led to a substantial decrease in the number of people suspended in 2021, and an increase in the number of people actively participating, as well as in the number of people withdrawn from the programme, as shown in Figure 17.

Figure 17. Suspensions and withdrawals



Source: Authors' own elaboration based on Gutiérrez et al (2019) and the Colombian Inspector-General's Office (2019).

However, concerns remain about the procedures used to withdraw families from the programme. In the 2019 survey response, 2,487 families were reported as being suspended and 607 withdrawn from the programme in Tumaco. In the 2021 data, 1,866 families in Tumaco were reported as having withdrawn, while 585 were reported as suspended (Freedom of information request 15 June 2021, resolved by the Territorial Renewal Agency, file No. 20212300083661). Almost 1,300 families were withdrawn from the programme in Tumaco without knowing whether the procedure applied was appropriate, whether they were properly notified of their suspension status, or if they would be given the opportunity to present a defence.

The 2021 survey reflected a similar panorama. A considerable number (22%) of respondents confirmed that they were suspended from the programme, while 2.6% said they were expelled.

Substitution lacks security guarantees for the leaders and participants of the programme

“We are putting our necks on the line while the government sits tight”. (Leader in Tumaco, 9 December 2018)

“Never before has a programme put us at risk like the PNIS does”. (The Observatory of Restitution and Regulation of Agrarian Property Rights, 2020)

The PNIS is based on a highly participatory model, in which peasant, community and ethnic organisations intervened and defined fundamental aspects of its implementation. In this sense, the PNIS created various opportunities to participate at the community, regional and national levels. The programme also promoted the participation and involvement of grassroots leaders, leaders of community action boards, peasant and ethnic associations, so that they could promote the programme and encourage families to engage in substitution. According to Gutiérrez et al. (2020:392-393), PNIS leaders have had different functions and roles within the programme:

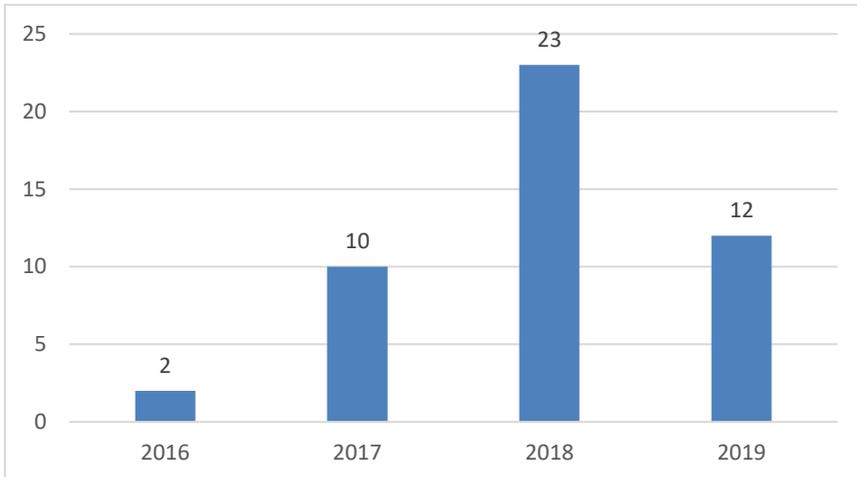
The programme established pedagogy exercises called community assemblies for organisations, leaders, as well as government and FARC delegates to participate. These became the first spaces in which fundamental commitments underpinning the programme were negotiated and defined. Collective agreements were reached that committed the State to implement the programme in a neighbourhood, group of municipalities, departments or regions, and the communities accepted voluntary eradication and committed to not replant their crops. These assemblies were also crucial for the election of delegates and representatives to municipal participation spaces such as the CMPP and the CMES (Direction for Illicit Crop Substitution, 2017). The leaders have participated in the negotiation of the collective agreements (as evidenced by the signatures to the agreements that are in the hands of the Direction for Substitution); they convened neighbours in their villages and led the processes of enrolment and registration of participants to the programme; they verified the status of harvesters; and they coordinated the work that former harvesters carry out in exchange for economic assistance.

Substitution leaders have faced multiple risks for having promoted the programme. But the high level of participation and responsibility exercised by the leaders of the substitution programme has not been matched with security guarantees, which the state was supposed to introduce. A statement from the National Coordinator of Coca, Poppy and Marijuana Growers (COCCAM) makes it clear that the leaders who promoted substitution have been exposed to various risks:

On the one hand, demanding the government to fully implement the Peace Agreement, including the PNIS, and resisting the armed groups, who see them as a threat to their business; and, on the other hand, motivating the community enrolled in PNIS [to] remain within the programme [and] who [also] complain about the government's non-compliance with PNIS. (COCCAM, 2020)

This perilous scenario has led to the killing of leaders who have promoted and participated in the programme. According to the Land Observatory's database on the killing of rural leaders, between 2016 and December 2019, there were 47 recorded murders of leaders who had promoted the substitution of illicit crops. Figure 18 shows these violations.

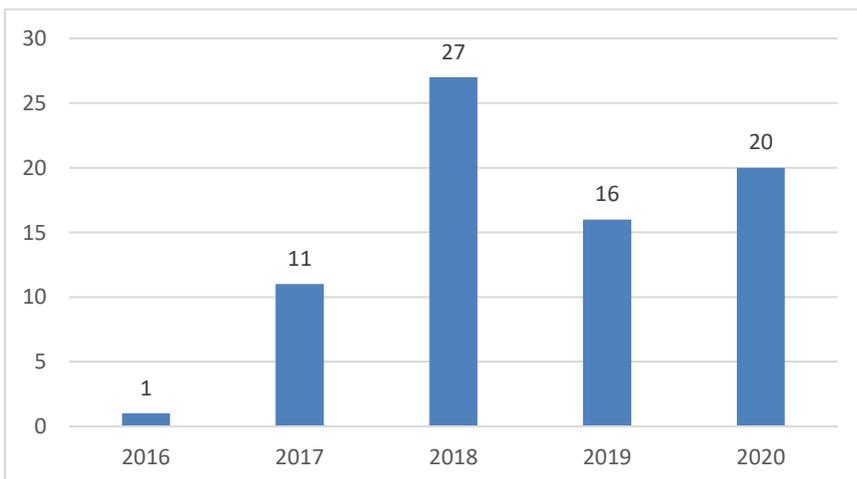
Figure 18. Murder of substitution leaders



Source: Gutiérrez et al., 2020

Other reports confirm this violence against substitution leaders. In 2020, the programme We Are Defenders (Somos Defensores) launched its report 'Aggressions against human rights defenders and peasant farmers linked to illicit crops'. This report documents the murders of 75 human rights defenders connected to the substitution of illicit crops. Just as the Land Observatory identified, at 27 registered murders, 2018 is the year with the highest number of recorded killings of substitution leaders. Figure 19 presents this data.

Figure 19. Murder of human rights defenders linked to illicit crops



Source: We Are Defenders programme, 2020

Of these figures recorded by the We Are Defenders Programme, 83% of the murders can be directly related to the PNIS, while 16% belonged to other processes of illicit crop substitution.

Substitution lacks community participation or consultation

The current situation of non-compliance and deteriorating security conditions have caused many of the leaders and social organisations who promoted the programme and had been involved in its implementation to cease to participate.

The Inspector-General's Office (2021) report indicates that in 2020, 17 Territorial Advisory Councils were held in 13 of the 14 departments in which the PNIS is being carried out; 31 CMES, 90 CMPP, and 12 joint CMPP and CMES sessions were held. However, local organisations have expressed concerns about the absence of these spaces, mainly during the government of President Duque. COCCAM, in its statement on 6 November 2020, denounced the absence of the Territorial Advisory Council in Caquetá since 19 November 2018, when the last Council was held (Coccam Caquetá, 2020). In other areas, social organisations refused to continue participating in these bodies. This was the case for the Regional Roundtable of Social Organisations of Putumayo, Baja Bota Cauca and Cofanía Jardines de Sucumbíos (MEROS), which belonged to the different municipal and regional bodies of the PNIS from the beginning. In its statement in November 2020, MEROS affirmed that:

As signatories of the substitution agreement on 26 July 2017, we hold the Direction for Substitution and UNODC responsible for the irregularities in the implementation of the Substitution Programme and for the acts of corruption that are occurring in its implementation which have been denounced by the communities. We hold the national government responsible for the murders, threats, uncertainties, armed controls and forced displacements in our communities and social organisations. As signatories of the substitution agreement, members of the Territorial Advisory Council and the Municipal Commission for Participative Planning we suspend our political-organisational actions in these bodies, given the lack of guarantees, additionally, we will not be accomplices of the irregularities in the implementation of the substitution programme. (MEROS, 2020)

One of the main failures of the PNIS participatory model is the failure to convene the Permanent Steering Council. The council has not met since the beginning of President Duque's mandate. According to Decree 362, the Council must meet at least once a month or as often as required. As the Inspector-General's Office (2021) indicates, the Council did try to organise on various dates during 2020, but this did not materialise. In conversations convened by the Land Observatory with leaders of organisations that participate in this body, the meeting did not take place due to a lack of agreement on the agenda. A statement by COCCAM dated 13 April 2021, denounced this breaching of the agreement:

(The government) has defunded the programme, built parallel programmes that are not funded, refuses to coordinate the PNIS with point 1 on Comprehensive Rural Reform, it has ignored the municipal participation bodies, excluded the organisations that form part of the Permanent Steering Council from decision-making, and has constructed rigged figures to justify the militarisation of the territories. (COCCAM, 2021)

Non-compliance with the Comprehensive Rural Reform affects the implementation of the PNIS

The Final Peace Agreement established the substitution programme as part of point 1 on Comprehensive Rural Reform. The overall design of the Peace Agreement proposed a harmonious coordination between the two strategies:

Point 4.1: The Programme will contribute to the structural transformations of rural society resulting from the implementation of the Comprehensive Rural Reform (CRR), of which it forms part, and to the establishment of the citizen participation mechanisms agreed upon.

Point 4.1.1: Integration in the Comprehensive Rural Reform (RRI): the PNIS is a component of the Comprehensive Rural Reform. It deals with populations and territories with specific characteristics that consequently require additional special measures with respect to other rural communities. The territories affected by crops used for illicit purposes may overlap with prioritised areas wherein the Development Programmes with a Territorial-Based Focus (PDETs) are implemented, in which case the acts and implementation of the Programme must be promoted within the context of the Action Plan for Regional Transformation of the territory in question. In cases where the territories do not overlap with the PDETs, comprehensive development plans will be implemented in agreement with communities, within the agricultural frontier, or the plans and programmes dealt with under the third sub-heading of section 1.1.10 will be implemented, with the aim of contributing to closing the agricultural frontier. Integration also involves the interrelation, engagement and linking of local, territorial and national matters. In that respect, the PNIS will be integrated into the development plans at the different levels of territorial planning.

Similarly, integration between the PNIS and RRI is consolidated in the regulatory framework Decree 896 of 2017. Article 7 prioritises the PNIS zones in the municipalities or territories where the PDETs will be implemented and Article 9 establishes that the PNIS and PDET will be in force together for 10 years.

The PNIS places special emphasis on the need to promote access to land for potential beneficiaries of the programme. Thus, the PISDAs have a land titling component that is once again integrated into the aims of the RRI. On this point, the Agreement states: "The Government will adapt the regulations to allow titling land to such beneficiaries, subject to the prior fulfilment of the commitments that guarantee that the property is free from crops used for illicit purposes and that no crops of that type will be re-sown." (Final Peace Agreement, 2016: 122).

Special emphasis on the issue of access to land was established through Decree 902 of 2017. Article 4 identifies the beneficiaries as peasants without land or with insufficient land who also participate in settlement and resettlement programmes, among these, programmes that aim to replace illicit crops. In addition, Title II of the Decree, which sets out the regulations for the Land Access Registry (RESO), the instrument through which

access to the Land Fund is established. Article 14 establishes some selection criteria to prioritise beneficiaries, among which is paragraph g, "people who are part of relocation and resettlement programmes with the aim of protecting the environment, substituting illicit crops and strengthening food production".

Given the significance of the integration of points 1 and 4, the stagnation of the key commitments of the RRI is concerning and is another serious breach of the PNIS. In this section, we would like to express concerns about two elements of point 1 that have not been adequately implemented and therefore affect substitution. First, the delays regarding access to land, mainly poor execution of the Land Fund. Second, the limited integration of PISDA and PDET.

Access to land has always been a crucial issue for substitution. Leaders recognise that the viability of a legal productive project depends on access to sufficient land. Likewise, the other strategies under point 1 (land titling, conflict resolution, closing the agricultural frontier, promotion of peasant reserve zones) played an important role in resolving the rural conflict derived from illicit crops and in guaranteeing sustainable conditions for productive projects.

CPEC suggests that around 1.3 million hectares have entered the fund, of which around 230,000 hectares have been handed over. However, different reports by the Inspector-General's Office (2020, 2021b, 2021a) have discussed how the government is considering the data on access and formalisation strategies, and mainly how it measures the goal of delivering three million hectares through the land fund and the formalisation of 7 million hectares. Likewise, the Inspector-General's Office has drawn attention to previously occupied land that is entering the Land Fund, which is not available. Taking this into consideration, the January 2021 report records the adjudication of 8,143 hectares, which corresponds to 0.3% of the target of three million hectares; while in the August 2021 report, the Inspector-General's Office indicated a figure of 9,034 hectares.

None of the reports include information about whether any of the recipients were part of the PNIS. With regard to land titling, the Inspector-General's Office (2021b) indicates that, based on information from the ANT, 5,728 hectares have been formalised for PNIS peasants on uncultivated land. Another 560 hectares were awarded through land access subsidies and 293 hectares corresponded to the formalisation of private land. These figures show delays in access to land and land titling in point 1, as well as the lack of characterisation, the construction of baselines and goals for PNIS registered users. The second issue that affects PNIS implementation is related to the way in which the PISDA was developed, and the way in which substitution was integrated into the PDET participatory process. Reports by the Agency for Territorial Renewal and CPEC show that the PISDA has been reduced to a labelling of the PDET initiatives (of which there are around 32,000 across the country) that may contain PISDA elements. However, there were no discussions of the plan in the participatory exercises in any municipality. The development of the PISDA implies more substantial agreements and discussions at different territorial levels that cannot be limited to the labelling of initiatives. The Inspector-General's report to Congress on the implementation of the AFP denounced these irregularities in the following terms:

In practice, the PNIS did not include a methodology for the PISDAs. It was added to the municipal PATR participatory exercises, without having defined the substitution strategies nor identified the rural areas to focus on. According to the database of PATR initiatives (accessed 31 December 2019), 58 municipalities were labelled for the PISDA, 12 of which were not PNIS, but no initiatives were marked in Tumaco, within which live 16% of the total number of PNIS beneficiaries at the national level. We are concerned that the PISDAs have become the sum of initiatives marked with this label in the PDET municipalities; and that this set of PISDA initiatives is neither representative nor sufficient to promote comprehensive structural transformation plans in territories with communities who have signed up to substitution agreements. As of June 2020, the DSCI reported 760 PATR initiatives with a PISDA label, in 47 municipalities with both PDET and PNIS interventions. (Inspector-General's Office, 2020, p. 330)

In the 2021 report, the Inspector-General's Office indicated that 812 PDET initiatives are PISDA-marked, of which 282 are tagged "ready for implementation". At the same time, the Duque government introduced 'roadmaps', a new phase of prioritisation and classification of the PDET initiatives derived from the PATRs. The government's budget includes 16 roadmaps for each PDET sub-region. So far, nine roadmaps have been produced. It raises serious concerns about the execution of this new planning phase, which appears to undermine and deteriorate the community participation in the PDETs and adopts criteria that do not relate to the essential principles or purposes of the Final Peace Agreement (CEPDIPO, 2021; Technical Secretariat CINEP & CERAC, 2021).

Defunding substitution

According to the PMI, point 1 on Comprehensive Rural Reform (RRI) comprises 85.5% of the total financing of the Peace Agreement, amounting to 110.6 trillion pesos; while point 4, on the solution to the drug problem, is the second most funded point of the agreement, corresponding to 8.3 trillion pesos (6.4%). The other points on the agreement account for 8% of the resources available (CONPES 3932-PMI, Medium-term Fiscal Framework 2017-2019). Table 8 shows the figures allocated according to the different points on the Peace Agreement.

Table 8. Resources for each point of the Peace Agreement

Point of the Agreement	Sum (billion pesos 2016)	Participation (%)	Annual average (billion pesos 2016)	Annual average (% PIB)
1. Comprehensive Rural Reform	110.6	85.5	7.37	0.8 %
2. Political Participation	4.3	3.3	0.29	0.03 %
3. End of the Conflict	1.9	1.5	0.13	0.01 %

4. Solution to the Problem of Illicit Drugs	8.3	6.4	0.55	0.06 %
5. Victims	4.3	3.3	0.29	0.03 %
Total	129.4	100%	8.63	0.94 %

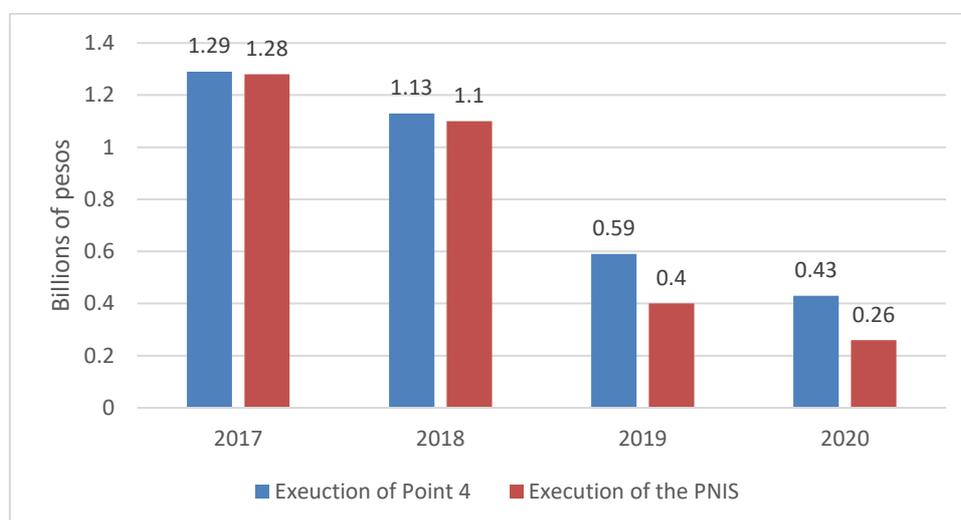
Source: Calculations CEPDIPO Working Paper No.3 based on PMI

As the Comptroller General's Office shows, the budget for item 4 was adjusted in 2018 according to the Medium-Term Fiscal Framework, for a total value of 7.9 trillion pesos (Comptroller General of the Republic, 2020). According to the PMI, the resources available for point 4 were allocated to the following strategies:

- Removal of mines in areas of illicit crop cultivation
- PNIS
- Immediate Attention Plans, productive projects and rapid execution of social infrastructure works
- PISDA
- National Programme for Comprehensive Intervention into Illicit Drug Use
- Strategy for the control of chemicals precursor and inputs required for the production of illicit drugs.

The main source of funding for point 4 has been the National Budget and resources from international cooperation through the Colombia in Peace Fund (FCP). According to the CGR report (2021), during the 2017-2020 period, 3.5 trillion pesos were spent on point 4, with 94% of this corresponding to pillar 4.1 on the PNIS. Although the PNIS is a central pillar of point 4, and indeed of the AFP itself, the neglect of the other two pillars is of concern, because they are integral components that make up the proposed solution to the problem of illicit crops: pillar 4.2 on drug consumption, prevention and public health; and pillar 4.3 the solution to the phenomenon of the production and commercialisation of narcotics. These resources were executed between 2017 and 2020 as shown in Figure 20.

Figure 20. Resources invested in Point 4 and PNIS



Source: CGR (2020, 2021)

Duque government officials constantly blame Santos for having left them an underfunded substitution programme (Archila, 2020). The phrase, "there is no money", has become a catchphrase used by state officials to justify non-compliance. As can be seen in Figure 21, the bulk of the programme's funding occurred in its first two years, during the Santos administration. The PNIS budget has since decreased year on year, following the change of government. Furthermore, the meagre resources available have been used for other types of programmes and support, not for meeting the needs of the 99,000 families enrolled. For example, the 2020 budget was earmarked for early childhood care and demining programmes (CGR, 2020).

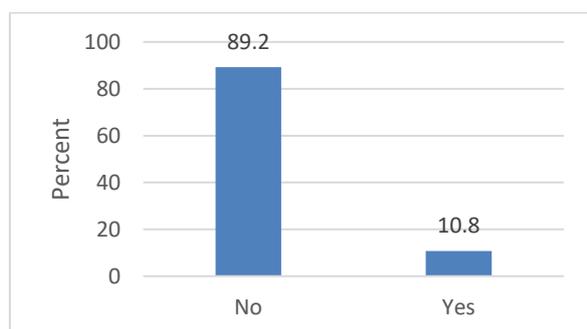
The graph shows that there was a budget of 8,968 million pesos allocated for the year 2021, although it is not clear which points on the AFP this corresponds to. In any case, it is worrying that there has been no budgetary allocation for the productive components of the individual PAI or the PISDAs since 2020. Likewise, the Comptroller's Office (2021) highlights the delay in other components of the programme, such as land formalisation and titling, and the restoration of environmentally protected areas.

Lessons learned and possible opportunities for voluntary substitution

The level of compliance of individuals enrolled in the PNIS has been the greatest success of the programme's implementation. The figures recorded by the Presidential Council for Stabilization and Consolidation indicate that less than 1% of the land registered in the programme has been replanted. The UNODC's annual report on illicit crop monitoring shows that just 7% has been replanted. This is significantly lower than the figure for land where forced eradication was carried out (38% when eradication had been carried out by the security forces, and 69% of land which was sprayed) (UNODC, 2021). This level of compliance was also recorded in the Land Observatory survey in both 2019 and 2021. In response to the question, "Do you know families enrolled in the PNIS who have replanted

coca?", in the 2019 survey of families in Tumaco and Puerto Asis, 90% of respondents said they did not know anyone who had replanted; while in the 2021 survey, 89.2% responded that they did not know anyone enrolled in the programme who had replanted. When a comparison is drawn between the people who answered the survey twice, the percentage does not vary significantly: while 92.4% in 2019 answered that they did not know anyone who replanted; in 2021 it decreased slightly to 89.8%.

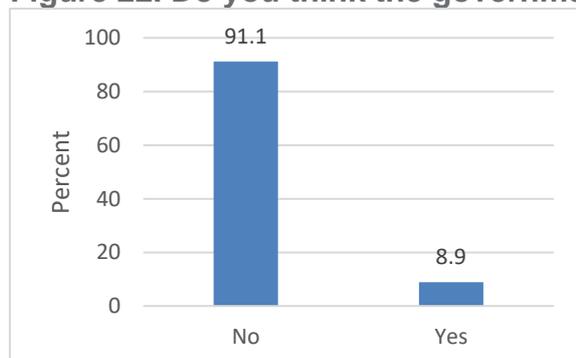
Figure 21. Do you know families enrolled in the PNIS who have re-planted coca?



Source: 2021 survey

The farmers' compliance is a sign of their willingness to substitute illicit crops, which contrasts with the state's record of non-compliance with the PNIS. In our survey, 91% of people said that in their opinion, the state had not fulfilled its commitments to the PNIS.

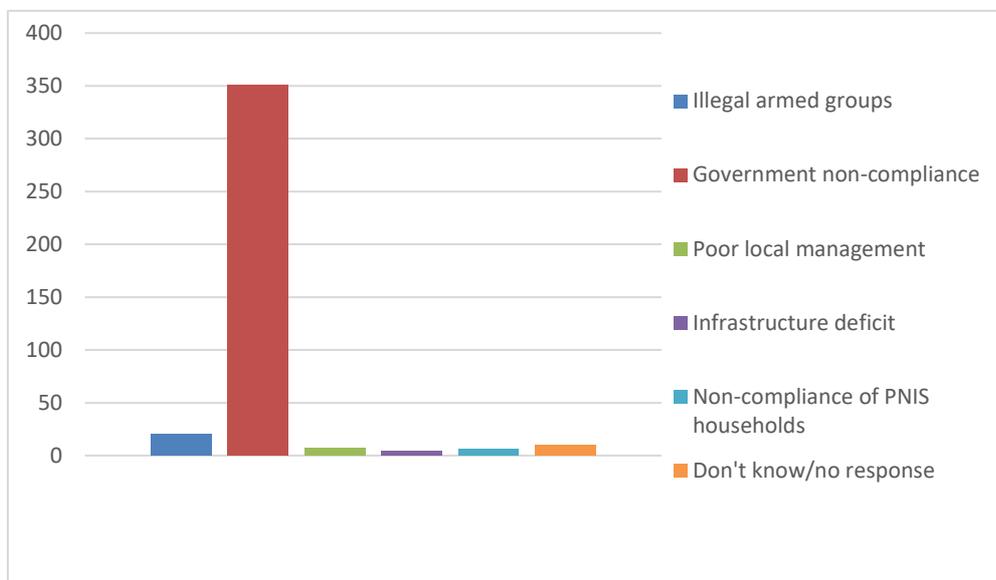
Figure 22. Do you think the government fulfilled its commitments to the PNIS?



Source: 2021 survey

In addition, respondents were asked "What do you think has been the biggest challenge to successfully implement the programme? This was a multiple-choice question. The overwhelming majority of respondents answered that government non-compliance has been the biggest setback.

Figure 23. What has been the biggest challenge to the programme’s implementation?

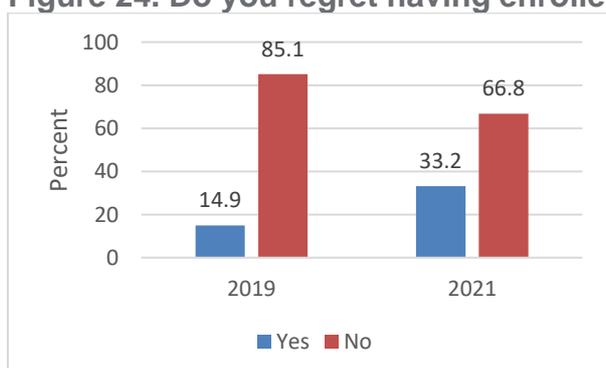


Source: 2021 survey

Despite the government's unquestionable breach of the programme, the majority of respondents (67.9%) stated that they did not regret having enrolled. In some of the workshops, peasant leaders suggested that people do not regret joining because they believe that the solution to illicit crops is dialogue and negotiation. According to these leaders, for many of those registered, accepting the programme was not only saying 'yes' to substitution, but also to peace.

The first lesson to take from the PNIS is to insist on substitution efforts, because of the will and determination of the peasants and ethnic communities to transition from war to peace. The problem we note, based on the survey results, is that this window of opportunity is closing, and the state will soon be left with very little room for manoeuvre to correct and rectify non-compliance with the PNIS. This can be seen in the perceptions of those who repeated the survey: while in 2019 14% said they regretted the programme, in 2021 this percentage increased to 33%.

Figure 24. Do you regret having enrolled in the PNIS?



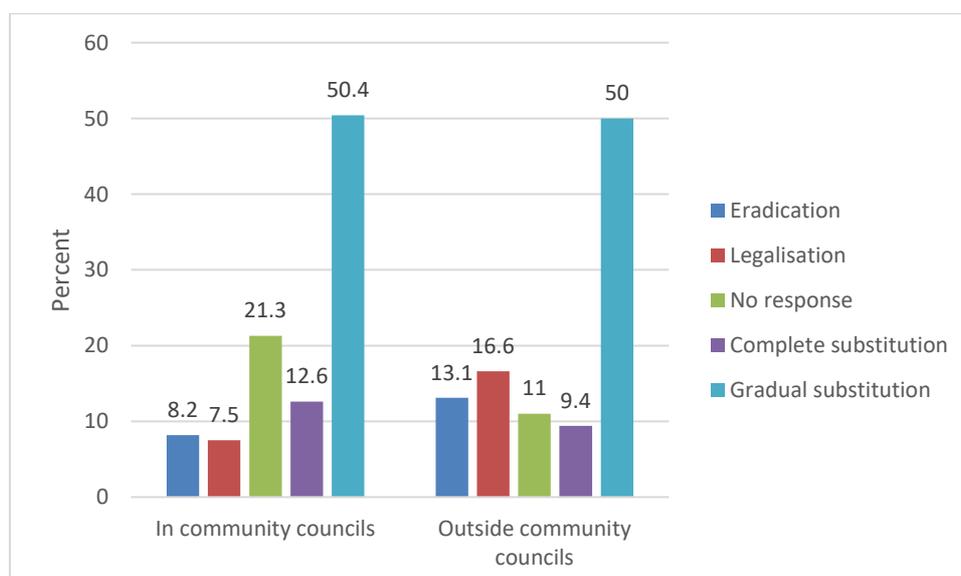
Source: 2019 and 2021 surveys

The second issue is related to the sequencing of substitution and forced eradication, and indeed the prioritisation of strategies designed by the Peace Accord. Although aerial fumigation with glyphosate has not been reactivated, the state did not comply with the order of interventions established in the agreement, which led to a lack of coordination between forced eradication and voluntary substitution. Santos' proposal to promote both strategies was counterproductive, generating serious civil unrest in the regions and strong confrontations between the security forces and the peasantry. Now, facing the reactivation of aerial fumigation, Duque has continued with forced manual eradication and ground spraying. At the time of writing, these confrontations continued to occur on a daily basis in territories that were awaiting voluntary substitution (Protest in Anorí Because of Forced Eradications, 2021).

The eradication/substitution overlap prompts us to rethink this sequencing of policy interventions. During the post-conflict period, manual eradication was conceived of as being a less harmful strategy for the communities. Evidence has shown otherwise (Machuca and Marín, 2020). In some cases, the courts decided to suspend eradication until substitution was fulfilled. It seems necessary to suspend forced eradication and to seriously attempt voluntary substitution, which was the goal of the Peace Accord in establishing an order or hierarchy of interventions.

The coca growers' movement and other relevant organisations have called for graduality, which implies thinking about other approaches, beyond the coca-zero criteria, with longer-term programmes and interventions, and greater shared responsibility between the farmer and the state. For the PNIS registered users surveyed in 2021, the way to achieve the transformation from illicit economies lies in gradual change; 50% of the people surveyed, belonging to both the community councils and people living in other territories, opted for gradual substitution.

Figure 25. What is the best way to transform the illicit drug economy?



Source: 2021 survey

Finally, we would like to highlight a key issue for the programme related to the agencies and personnel in charge of substitution. Clearly, the transition from an illicit to a licit economy in the framework of a peace process is a high-risk operation, which requires institutional effort at various levels. Point 1 and point 4 aimed to bring about major social transformation in the territories affected by violence, agrarian inequality and armed conflict. The effectiveness of these changes, in addition to having the necessary resources and budget, requires consolidated bureaucracy in the territories. The PNIS - and other agrarian issues - suffer from heavy red tape. Gutiérrez et al. (2019) show the relationship between the number of registered users and civil servants. In reality, PNIS administrators were overwhelmed with having almost 100,000 families to attend to; Table 9 illustrates this scenario.

Table 9. Ratio of registered officers to PNIS participants

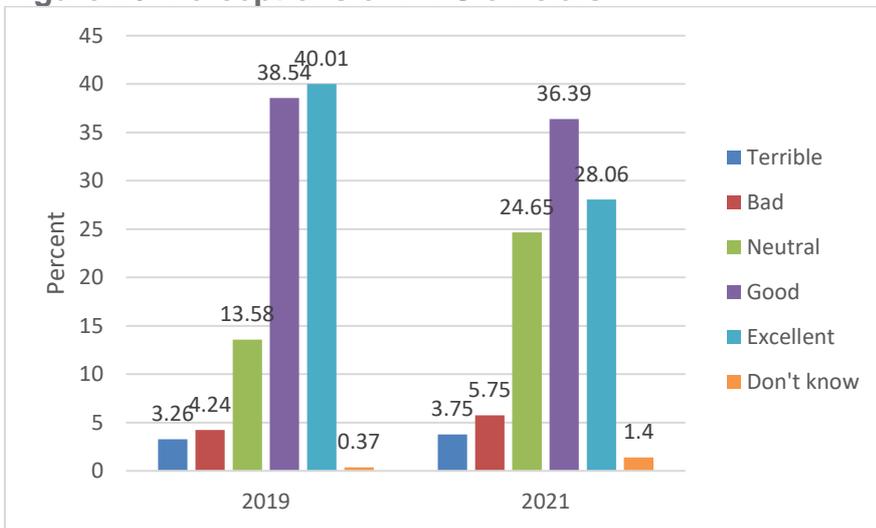
Department	Number of PNIS officers	Number of families registered in the PNIS-UNODC Report No. 17	Ratio of registered persons/officials
Bogotá	34		
Jurídicos	15		
Antioquia	9	11,777	1,308
Arauca	3	496	165.3
Caquetá	5	12,951	2,590.2
Cauca	6	5,685	947.5
Chocó	1		
Córdoba	5	5,996	1,199.2
Guaviare	5	7,251	1,450.2
Meta	8	9,702	1,212.7
Nariño	12	17,235	1,436.2
Norte de Santander	4	3,000	750
Putumayo	12	20,331	1,694.2
Sur de Bolívar	5	2,754	550.8
Valle del Cauca	3	1,066	355.3
Vichada	3	826	275.3
Operations	3		

Supervision	6		
TOTAL	139	99,070	

Source: Gutiérrez et al (2019). Data obtained from the response to a freedom of information request to CPEC OFI19-00124662 / IDM 1207004 17 October 2019.

The 2021 survey shows that, despite failures, the people registered received the actions of PNIS officials positively, as shown in Figure 26. Therefore, if the programme is to be saved, improving on these positive experiences with the authorities will be a key step.

Figure 26. Perceptions of PNIS officials



Source: 2019 and 2021 survey

5. Conclusion

The report has presented a comprehensive evaluation of the scope of implementation of the PNIS. The programme has indisputably failed, from its most fundamental components, such as the bimonthly payments to households, to its strategic aspects, such as prioritising substitution over forced eradication. Guaranteeing a transition from illicit crops to legal economies is neither sustainable nor viable in this context of limited implementation and the stark omission of key aspects of the programme, such as the law on differential judicial treatment.

The substitution programme proposed in the AFP requires budgetary efforts and institutional capacity that never existed in the first five years of implementation of the Agreement. Attempts to make recommendations or to talk about correcting trends in the programme's implementation - or rather, lack of implementation or non-implementation - is a meaningless task. The substitution of illicit crops which was proposed in the Final Peace Agreement did not fulfil its objective of guaranteeing a sustainable transition to legality for small producers. The broad territorial transformation commitments are even further from being achieved. Security conditions in the territories are worsening by the day. In the

regions investigated in our study, armed actors have gone so far as to prohibit leaders from talking about substitution. The lack of security guarantees today makes the transition process impossible.

Although the PNIS is portrayed as a programme beyond repair, or, even more pessimistically, a failed programme, our survey shows that voluntary and concerted substitution continues to be the best option for peasant farmers to make the transition to legality. Of course, in a scenario where the peasant farmer is faced with the "carrot" of alternative development or the repressive "stick" of forced eradication, the "carrot" appears to be a more favourable option, even if it is fraught with complications, mistrust and non-compliance, and - not infrequently – is destined to fail. It seems that the takeaway message, offered in a fairly hopeless tone, is to continue dialogue and community consultation with those who subsist on these crops, and to try new sequences of intervention, in the hope that subsequent efforts to substitute will not suffer from the same cynical non-compliance and failed agreements between the government and the coca growers.

Bibliography

Asocurn, A. de C. U. R. N. (2017). Erradicación forzada incumple acuerdos de La Habana. *Prensa Rural*. <https://prensarural.org/spip/spip.php?article20960>

Acero, C., & Machuca, D. (2021). The substitution program on trial: progress and setbacks of the peace agreement in the policy against illicit crops in Colombia. *International Journal of Drug Policy*, 89, 103158. <https://doi.org/10.1016/j.drugpo.2021.103158>

Acero, C., Parada, M., & Machuca, D. (2019). La paz narcotizada: decisiones, presiones y diseño institucional del programa nacional integral de sustitución de cultivos de uso ilícito. *Análisis Político*, 97.

Archila, E. (2020, September 29). “En 2 años hemos tenido que hacer lo que se debió hacer en 4”: Archila. *El Tiempo*. <https://www.eltiempo.com/politica/proceso-de-paz/entrevista-con-emilio-archila-en-2-anos-hemos-tenido-que-hacer-lo-que-se-debio-hacer-en-4-540647>

CEPDIPO. (2021). *Las “hojas de ruta” de los programas de Desarrollo con enfoque territorial (PDET) Crítica a una metodología para el falseamiento del Acuerdo de paz*. <https://cepdipo.org/portfolio/las-hojas-de-ruta-de-los-programas-de-desarrollo-con-enfoque-territorial-pdet-critica-a-una-metodologia-para-el-falseamiento-del-acuerdo-de-paz/>

COCCAM. (2017a). *Comunicado a la Opinión Pública: ESMAD debe frenar acciones violentas contra comunidades campesinas del país*.

COCCAM. (2017b). *Comunicado COCCAM Nariño y COCCAM municipio de Tumaco*.

COCCAM. (2020). *Comisión Política Nacional de la COCCAM*. A la población colombiana en rechazo a la entrevista publicada en el periódico el espectador el viernes 24 de enero de 2020.

COCCAM. (2021, April 13). *Rechazo a la reanudación de la fumigación con glifosato y llamado a la acción unitaria de las organizaciones en defensa de lo acordado en el acuerdo de paz*. <https://twitter.com/COCCAMColombia/status/1382085846451503104/photo/2>
Coccam Caquetá. (2020, November 6). *Comunicado a la Opinión Pública COCCAM Caquetá*.

COCCAM, Frontera, C. C. A. M. y, ASOMINUMA, ASOPORCA, & Tumaco, D. de. (2017). *Comunicado a la Opinión Pública*.

Consejería Presidencial para la Estabilización y Consolidación. (2019). *Informe de Gestión PNIS*.

Consejería Presidencial para la Estabilización y Consolidación. (2021a). *Avanza la sustitución con legalidad*. <https://www.portalparalapaz.gov.co/publicaciones/990/informes-de-seguimiento/>

Consejería Presidencial para la Estabilización y Consolidación. (2021b). *Informe de Resultados agosto 2021*. <https://www.portalparalapaz.gov.co/publicaciones/1112/informes-de-resultados/>

Consejería Presidencial para la Estabilización y Consolidación. (2020, June). *Avanza la sustitución con legalidad. Diagnóstico, avances y Planeación PNIS*.

Consejería Presidencial para la Estabilización y Consolidación. (2021c). *Informe de resultados octubre 2021*. <https://www.portalparalapaz.gov.co/publicaciones/1112/informes-de-resultados/>

Contraloría General de la República. (2020). *Cuarto informe sobre la ejecución de los recursos y cumplimiento de las metas del componente para la paz del Plan Plurianual de Inversiones*.

Contraloría General de la República. (2021). *Quinto Informe sobre la ejecución de los recursos y cumplimiento de las metas del componente para la paz del Plan Plurianual de Inversiones*.

Dirección de Sustitución de Cultivos Ilícitos. (2017). *Descripción hoja de ruta metodológica de intervención del PNIS*.

El Nuevo Siglo. (2021). "No es posible ampliar el programa de sustitución de cultivos." *El Nuevo Siglo*. <https://www.elnuevosiglo.com.co/articulos/04-16-2021-no-es-posible-ampliar-el-programa-de-sustitucion-de-cultivos-con-este-modelo>

El Tiempo. (2021a). Erradicación: en promedio, cada día de 2021 se han registrado tres bloqueos. *El Tiempo*2. <https://www.eltiempo.com/justicia/conflicto-y-narcotrafico/erradicacion-en-promedio-cada-dia-de-2021-se-han-registrado-tres-bloqueos-629047>

El Tiempo. (2021b). Este 2021 van 1.017 bloqueos para evitar jornadas de erradicación de coca. *El Tiempo*. <https://www.eltiempo.com/justicia/conflicto-y-narcotrafico/erradicacion-forzada-este-2021-van-1-017-bloqueos-para-frenar-labores-628667>

Gobierno Nacional de Colombia y FARC-EP. (2016). Acuerdo Final Para la Terminación del Conflicto y la Construcción de una Paz Estable y Duradera. https://www.cancilleria.gov.co/sites/default/files/Fotos2016/12.11_1.2016nuevoacuerdofinal.pdf

Government of Colombia and FARC-EP. (2016). Final Agreement to End the Armed Conflict and Build A Stable and Lasting Peace.

<http://especiales.presidencia.gov.co/Documents/20170620-dejacion-armas/acuerdos/acuerdo-final-ingles.pdf>

Guaviare, C. (2017). *Comunicado COCCAM Guaviare, Sur del Meta y Suroccidente de Vichada, MIA Departamento Guaviare y Sur del Meta Fundación por la defensa de los derechos humanos y el derecho internacional humanitario del oriente y centro de Colombia.*

Gutiérrez, F., Machuca, D., & Cristancho, S. (2019). ¿Obsolescencia programada? La implementación de la sustitución y sus inconsistencias. *Análisis Político*, 97.

Gutiérrez, F., Marín, M., Machuca, D., Parada, M., & Rojas, H. (2020). Paz sin garantías: el asesinato de líderes de restitución y sustitución de cultivos de uso ilícito en Colombia. *Estudios Socio-Jurídicos*, 22(2). [http://files/5597/Gutiérrez et al. - 2020 - Paz sin garantías el asesinato de líderes de rest.pdf](http://files/5597/Gutiérrez%20et%20al.%20-%20Paz%20sin%20garantías%20el%20asesinato%20de%20líderes%20de%20rest.pdf)

Justicia, M. de. (2018). *Ruta futuro: política integral para enfrentar el problema de las drogas.*

Machuca, D., & Marín, M. (2020). *Erradicación Forzada: una política que mata.* <https://www.observatoriodetierras.org/erradicacion-forzada-politica-que-mata/>

Machuca, D., & Triana, B. (2021). El regreso de las aspersiones: una afrenta a la paz. In Observatorio de restitución y regulación de los derechos de propiedad agraria (Ed.), *Fumigación: Daños a la salud democrática.* <https://www.observatoriodetierras.org/reportes-semestrales-sobre-proceso-de-restitucion/>

MEROS. (2020, November 24). *¡¡¡ACUERDO HUMANITARIO YA!!! 24 de Noviembre de 2020 Comunicado a la Opinión Pública.*

Observatorio de restitución y regulación de los derechos de propiedad agraria. (2020). La sustitución agoniza en Tumaco. *El Espectador Colombia 2020.* <https://www.elespectador.com/colombia2020/opinion/la-sustitucion-agoniza-en-tumaco-columna-904917>

Organizaciones Sociales del Catatumbo. (2021). *Comunicado público en respaldo a las organizaciones sociales del Catatumbo.* <https://twitter.com/CpdhDe/status/1455900181816303621/photo/1>

Procuraduría General de la Nación. (2020). *Segundo Informe al Congreso Sobre el Estado de Implementación del Acuerdo de Paz.*

Procuraduría General de la Nación. (2021a). *Informe sobre el estado de avance de la implementación de las estrategias de acceso a tierras y uso del suelo rural contempladas en el acuerdo de paz.*

Procuraduría General de la Nación. (2021b). *Tercer Informe al Congreso sobre el estado de avance del Acuerdo de Paz*. [https://www.procuraduria.gov.co/portal/media/file/Tercer informe Acuerdo de Paz 2021.pdf](https://www.procuraduria.gov.co/portal/media/file/Tercer%20informe%20Acuerdo%20de%20Paz%202021.pdf)

Protesta en Anorí por el inicio de las erradicaciones forzadas. (2021, October 23). <https://twitter.com/GarantiasPSG/status/1452075417108615168>

Región. (2019). PNIS no recibirá nuevas familias para sustitución de coca. *La Opinión*. <https://www.laopinion.com.co/region/pnis-no-recibira-nuevas-familias-para-sustitucion-de-coca-174046#OP>

Revista Semana. (2021). Atención: libres los 187 militares que estaban secuestrados en el Catatumbo. *Revista Semana*. <https://www.semana.com/nacion/articulo/atencion-libres-los-187-militares-que-estaban-secuestrados-en-el-catatumbo/202106/>

Secretaría Técnica CINEP & CERAC. (2021). *Segundo informe de verificación de la implementación del enfoque étnico en el Acuerdo Final de Paz en Colombia*. <https://www.cinep.org.co/Home2/component/k2/884-segundo-informe-de-verificacion-de-la-implementacion-del-enfoque-etnico-en-el-acuerdo-final-de-paz-en-colombia.html>

UNODC. (2021). *Monitoreo de territorios afectados por cultivos ilícitos 2020*. https://www.unodc.org/documents/crop-monitoring/Colombia/Colombia_Monitoreo_de_territorios_afectados_por_cultivos_ilicitos_2020.pdf

UNODC. (2020). *Informe Ejecutivo UNODC No. 23*.

Valencia, M., & Triana, B. (2021). Embaucaron a los campesinos y a la paz. *El Espectador Colombia 2020*. <https://www.elespectador.com/colombia2020/opinion/embaucaron-a-los-campesinos-y-a-la-paz/>

Vasquez, D. (2021). Campesinos de Anorí denuncian intimidaciones con disparos al aire en operativos de erradicación. *Blu Radio*. <https://www.bluradio.com/blu360/antioquia/campesinos-de-anori-denuncian-intimidaciones-con-disparos-al-aire-en-operativos-de-erradicacion>

Verdad Abierta. (2017). *Tensión por masacre de Tumaco se traslada a los discursos*. <https://verdadabierta.com/tension-por-masacre-de-tumaco-se-traslada-a-los-discursos/>

Veredas Tumaco. (2017, April 8). *Comunicado veredas de Tumaco*.

Appendix 1. PNIS survey methodology 2021

Group objective: Men and women over 18 years of age who are enrolled in the PNIS; and who have participated in previous evaluations (2019)

Sampling frame: Neighbourhoods in the chosen municipalities

Sample size: 413 surveys

Method: Individual interviews using a structured questionnaire

Data collection period: 18 May - 4 June 2021.

Geographic coverage: San Andrés de Tumaco (Nariño)

Sample

Basic components

Statistical operation

Disproportionate stratified cluster sampling

Target population

Families enrolled in the Illicit Crop Eradication and Substitution Programme, located in: San Andrés de Tumaco (department of Nariño): 16,658 families living in 133 neighbourhoods.

Accessible population

Due to public unrest, the presence of illegal armed groups, displacement to other municipalities, or a lack of interest from the social leaders who represent them, the following part of the population was studied: San Andrés de Tumaco (Department of Nariño): 12,719 families living in 93 villages (77% of the target population).

Cover and geographical breakdown

In accordance with the sample design, the results of this research are representative of the families who are part of the subject population in the 93 neighbourhoods of San Andrés de Tumaco described in Annex 1_Tumaco.

Statistical units

The primary sampling unit was the neighbourhood, and the secondary sampling unit was the family participating in the illicit crop eradication and substitution programme. The units on which to record data are groups that describe the characteristics of a population. In this case, the basic unit of observation is the family, and respondent was the head of the household.

Sampling design

Sampling frame

An inventory of all of the neighbourhoods where families belonging to the illicit crop eradication and substitution programme reside.

Type of sampling

To begin, it should be made clear that the inclusion of a group of 16 neighbourhoods who participated in the 2019 survey in the sample was compulsory; this was done in order to monitor and compare the trends that the evaluation revealed.

In the other neighbourhoods, the following procedure was carried out: In accordance with the objectives and the characteristics of the framework, a probability, stratified, cluster, multi-stage sample was chosen, according to the following criteria:

Probability

Each primary sampling unit of the accessible population (neighbourhood) has a known probability of selection greater than zero (Probability calculated from the total number of families selected with respect to the total number of families belonging to the stratum to which it belongs).

- **Stratification**

This method ensures better sample precision by decreasing the variance of the estimates.

- **Stratification criteria**

Neighbourhoods in Tumaco with families participating in the illicit crop eradication and substitution programme were identified. Taking into account that the number of families in the neighbourhoods varies between 629 and 1 families, these neighbourhoods were classified into quartiles.

Subsequently, a sample of neighbourhoods was selected for each quartile, which was associated with a cluster (a geographical grouping that concentrates a certain number of families).

And for each of the randomly selected villages, we proceeded to select the families and their corresponding respondent.

Sample size

Taking the characteristics of the target population into consideration: geographic location, access, security situation and the subject matter, the following sample size was defined, in order to obtain results at a general level with a reliability of 95% and a margin of error of no more than 4.8% for phenomena occurring at more than 50%.

143 interviews were carried out and distributed as follows:

Neighbourhood	Grower	Harvester	Share-cropper	Unknown/ no response	TOTAL
Imbili	6	1	21	0	28
Candelilla	23	0	1	0	24
16 Agosto/candelilla	19	0	0	0	19
La Balsa	17	0	0	0	17
Alto Pusbi Zona 5	16	0	0	0	16
Pital Piragua	6	0	8	2	16
Las Mercedes	15	0	0	0	15
San José de Caunapi	15	0	0	0	15
San José del Guayabo	15	0	0	0	15
La Guayacana	12	1	0	0	13
La Variante km 54	12	0	1	0	13
Palo Seco	12	0	0	1	13
Pueblo Nuevo km 41	12	1	0	0	13
Chajal	11	0	1	0	12
El Paraíso	11	0	1	0	12
Pambil km 43	12	0	0	0	12
Pulgande km 53	7	5	0	0	12
Restrepo	12	0	0	0	12
San Antonio de Curay	11	1	0	0	12
San Francisco	12	0	0	0	12
Vaquero km 69	8	4	0	0	12
Bellavista	9	0	2	0	11
Pambilar	6	0	5	0	11
La Piñuela	10	0	0	0	10
Miras Palmas	9	0	1	0	10
Rastrojada	10	0	0	0	10
La Vega	8	0	0	1	9
Tiesteria Zona 4	8	1	0	0	9
Chilvi	8	0	0	0	8
El Panal	5	0	3	0	8
Inguapi del Guadual	7	0	1	0	8
La Loma	1	0	5	0	6
TOTAL	345	14	50	4	413



drugs & (dis)order



'Drugs & (dis)order: building sustainable peacetime economies in the aftermath of war' is a Global Challenges Research Fund (GCRF) project generating new evidence on how to transform illicit drug economies into peace economies in Afghanistan, Colombia and Myanmar.

The views presented in this paper are those of the author(s) and do not necessarily represent the views of GCRF, the UK Government or partner organisations.

@ Drugs & (dis)order 2022

Twitter: @drugs_disorder

Website: www.drugs-and-disorder.org

Photos

Cover: Policía Antinarcóticos, Tumaco. Photo by Policia Nacional de los colombianos (CC BY-NC-ND 2.0)

Inner cover: Presenting survey results back to coca farming communities in Tumaco. Photo by Frances Thomson/Universidad Nacional de Colombia

Back cover: Standing on guard after burning a coca laboratory near Tumaco. Photo by Policia Nacional de los colombianos (CC BY-NC-ND 2.0)