

Pesticide Stewardship and Container Recycling

Background



The pesticide industry has been a leader in reducing the need for plastic containers by developing lower-dosage products, bulk products and refillable containers. High density polyethylene (HDPE)

containers, however, remain an economical way to deliver crop protection products to the farm. As part of responsible stewardship, the industry has established and supported collection and recycling programs for cleaned, empty pesticide containers and has engaged retailers and users to recycle. Since 2001, CropLife America (CLA) has required its members to participate in the Ag Container Recycling Council (ACRC) and its program for collecting and recycling triple- or pressure-rinsed, non-refillable, high-density polyethylene pesticide containers.

ACRC is a nonprofit organization created in 1992 that is funded by major pesticide manufacturers and distributors who collect, consolidate and transport plastic to approved recyclers. The collection programs are supported by state agencies, associations, retailers and extensions, as well as others in agriculture-related industries.

HDPE empty pesticide containers may only be used in approved products that include fence posts, guard rails, field drainpipes, marine pilings, roadside sign posts or energy recovery.

Only clean, empty containers are accepted by non-hazardous waste landfills or container collection centers. Proper rinsing of empty pesticide containers is a requirement of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and properly rinsed pesticide containers are considered non-hazardous solid waste by the Federal Resource Conservation and Recovery Act (RCRA).

Empty polyethylene totes and steel pesticide drums are also rinsed and recycled.

CLA welcomed the Container-Containment rule that was finalized in August 2006 by the Environmental Protection Agency (EPA) because it established national standards for pesticide packaging and containment. CLA believes the new containment rule is very sound from a risk/benefit perspective and reflects best management practices in place today.

Position

CLA is strongly encouraging EPA to develop pesticide container recycling regulations in 2007. Creating and finalizing a recycling provision is pivotal to CLA's strategy of solving the fairness issue of only CLA members absorbing the cost of recycling and improving recycling service.

In anticipation of the new rule, CLA recently changed its membership requirements to allow participation in alternative programs that compare with technical standards set by ACRC.

- CLA strongly believes that recycling of HDPE containers should remain voluntary for growers and agricultural retailers and that triple-rinsed containers remain non-hazardous waste.
- CLA recommends that pesticide registrants be required by EPA to recycle pesticide containers through organizations such as ACRC and that trade associations align themselves to emphasize recycling.
- CLA strongly supports EPA's efforts to develop a proposed recycling rule to be published in 2007. EPA stated in the preamble of its 2006 Container-Containment rule that is also committed to this goal.
- Only clean, empty containers should be accepted by non-hazardous waste landfills or container collection centers.