

From Discovery to Recovery

Waste classification gives new life to old containers



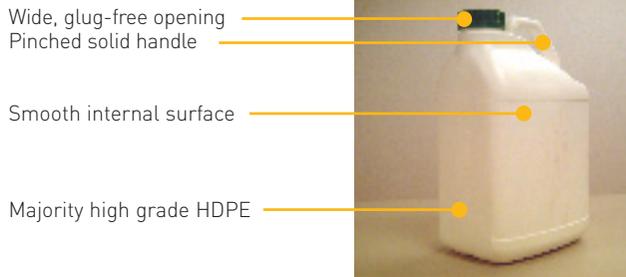
This leaflet summarises the legal, technical and economic arguments for a non-hazardous waste classification for rinsed and drained crop protection plastic containers. ECPA and a number of agricultural stakeholders are convinced that a non-hazardous classification is the key to maintaining and improving farm packaging waste management.

Crop protection container basics

Containers play a central role in the safe and effective delivery of crop protection products to the target pest whilst at the same time protecting the public, supply chain and users from the chemicals involved. Additionally containers need to be designed and managed to contribute to the wiser, sustainable use of resources.

At least 80% of crop protection containers in Europe are plastic with the majority being High Density Polyethylene (HDPE). Plastic containers are mainly used to carry liquid products whilst paper based containers are used carry solids.

The members companies of ECPA have developed and implemented a voluntary industry design standard for crop protection plastic containers that has subsequently been followed by the industry as a whole.



Rinsing and draining of crop protection containers, as method of decontamination, is very effective. This is because the water used for rinsing can subsequently be applied to the crop and no additional waste is produced. At the same time it also ensures that the farmer does not leave any expensive product behind in the container.

National trade associations and collection schemes are already informing farmers of the benefits and importance of rinsing containers, and as a result the majority of farmers are making resource management part of and integral to their businesses.

A clear message has emerged for farmers supported by all stakeholders:

“Rinsing and draining of crop protection containers makes environmental and economic sense and leads to a non-hazardous waste classification”

But what of the regulatory response?

In 2003 ECPA became aware of an issue in some European countries where regulatory authorities were insisting that crop protection plastic containers were hazardous waste even though they had been rinsed. Follow-up surveys confirmed an inconsistent waste classification of crop protection plastic containers within the EU.

At least one third of European Union (EU) countries declare rinsed plastic containers as hazardous whereas others accept a non-hazardous classification.

Clearly this situation was not envisaged when the European Waste Catalogue¹ was introduced and threatens to undo the considerable progress that is being made in sustainable farm container waste management.



¹ EWC: Commission Decision 2000/532/EC and its amendments

What are the effects of the current regulatory position?

1. An unclear message is being given to farmers about the decontamination of containers by rinsing. If there are too many 'ifs' and 'buts', farmers will be confused leading to an increased risk of poor waste management practice.
2. To ensure the safe collection and recovery of containers ten schemes have been established by the industry in the EU and others are planned. The collection rates of all schemes are increasing year on year and delivering an ever-improving service to farmers. When fully operational schemes deliver the collection service at a low cost to farmers.

The lack of a European wide non-hazardous classification has major current and future implications for the collection and recovery of crop protection plastic containers from European farms:

- In the worse case, where a hazardous classification became the norm across Europe, it would become significantly more difficult to continue to operate or set up schemes. It has been estimated that only one third of current collection sites would be suitable for hazardous waste
- Scheme costs to farmers would increase between three to four times
- In some Member States farmers would benefit from a low cost collection and recovery scheme and in others they would not

What are the benefits of a non-hazardous classification?

A non-hazardous classification would assure the operation of current schemes and their spread into other countries within the EU resulting in:

- A safe, low-cost means of disposal for farmers
- Further improvements in farm waste management
- A significant increase in the collection and recycling of plastic container waste from the countryside

How is ECPA trying to help?

Faced with the threat to the collection schemes and the environment ECPA took a decision to use the current European classification law, the European Waste Catalogue, to establish the waste classification of:

- Crop protection plastic containers arising on farms
- Consignments of containers arising on collection sites

The initial findings are as follows:

1. In general rinsed crop protection plastic containers arising on European farms are non-hazardous waste. Most have a large safety factor which results from the effectiveness of rinsing as a method of decontamination and the EWC limits.
2. The remaining containers which are hazardous are small in number and quantity. This is because there are few products in the marketplace which have the potential to give rise to hazardous container waste and/or the sales of such products is low.
3. Consignments of containers are non-hazardous.
4. The risk to the health and the environment is 'low' when rinsed waste containers are collected as part of a scheme established by the industry. Schemes have already developed and implemented a number of effective methods of controlling the risk associated with the collection of container waste.

Industry can now state with confidence that more than 97% of decontaminated crop protection plastic containers produced in the EU are non-hazardous waste and that this figure will increase in future years.



What is the way forward?

The industry maintains that it is proportionate with the risk involved and benefits that could accrue if all decontaminated crop protection plastic containers were recognised as non-hazardous waste across the EU. This would mean that all rinsed and drained plastic containers were decontaminated, collected by schemes and safely removed from the countryside.

The following steps are proposed by ECPA:

1. The EU Commission should ensure that rinsing and draining of crop protection plastic containers becomes part of agricultural best practice throughout the EU.
2. The EU Commission should take steps to ensure that a non hazardous waste classification for decontaminated crop protection plastic containers exists within all Member States.

These steps would bring the situation into line with FAO Guidelines² on rinsed containers.

The details behind these summary findings can be found in the report 'Crop protection plastic containers, the case for a non hazardous waste classification.' ECPA 2007. Available at www.ecpa.eu

² International Code of Conduct on the Distribution and Use of Pesticides: Guidelines on Management Options for Empty Pesticide Containers, FAO 2007



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