

**After
Spraying**

Pesticide Container Disposal



🔥 New disposal legislation

New farm waste legislation "Waste Management (England and Wales) Regulations" which applied from 15 May 2006 forbids the burning or burial of pesticide containers on farms and holdings in England and Wales. The regulations applied with immediate effect although for some activities farmers had 12 months ie until May 2007 to comply with the regulations. Farmers in England and Wales must no longer follow previous advice on container incineration. Detailed advice on the regulations are available from the Environment Agency (EA). Similar changes are taking place in Scotland and Northern Ireland (see overleaf)

WARNING: Using the Drum Incinerator is now Illegal in England and Wales

This guide gives advice on the disposal of pesticide packaging. More detailed guidance on Container Cleaning and disposal of other pesticide waste is included in separate CPA Guides.

🔥 Why can't I use the drum incinerator?

The drum incinerator was originally introduced to reduce emissions of dark smoke. In the light of improving environmental and health standards and the new farm waste legislation the EA has carried out a technical and scientific assessment of the drum incinerator. The assessment showed that the design of the drum incinerator would not meet modern environmental, health and safety standards. Technically individual farmers may apply for a waste management licence to use a drum incinerator, but the EA have already indicated that it is extremely unlikely that they would give such an authorisation. Different arrangements apply in Scotland and Northern Ireland. (see overleaf)

🔥 What are my options?

The only legal options for pesticide containers are **recycling or professional waste disposal**. This means you must use either:

- a recycling or waste disposal contractor or
- a licensed disposal sites, subject to their availability and conditions for accepting such waste

The following measures will make managing packaging waste easier and reduce possible costs:

- **Reduce packaging materials**
 - Look carefully at the packaging solutions available for the products you use;
 - Consider returnable packs such as Surefill and Linkpak if they fit your farming system;
 - Choose larger pack sizes if they fit your needs; bigger packs mean less packaging.
- **Clean the packaging**
 - Clean packaging is regarded as non-hazardous and will attract lower disposal charges than dirty packaging. It can cost five times more to dispose of hazardous materials.
 - Avoid contaminating any clean material by careless working practices — keep the cardboard outers clean;
- **Sort the material**
 - Check with your waste disposal/recycling contractor how and if materials need to be sorted in to different packaging types eg: cardboard, plastics, metals
- **Choose the contractor carefully**

Recycling and waste disposal contractors offer a range of services and can handle a range of different waste materials. Check the following:

 - Will the material be recycled? - this is obviously preferable
 - Can they handle all the materials you wish to dispose of?
 - Do they provide bins for storing and segregating materials?
 - How often they will collect ? This will affect the amount of storage capacity you need.

Costs will vary depending on disposal routes, frequency of collections, the volumes/weights and types of material requiring disposal.

🔥 Find the right contractor

A new website www.wasterecycling.org.uk has been set up to enable farmers and growers to identify suitable recycling and waste disposal contractors. The site allows users to search by post code and waste type. Also look in Yellow Pages for registered waste disposal contractors.

In England and Wales more advice can be obtained from EA's agricultural waste help-line: **0845 603 3113**

Whoever you choose to remove your waste there is a legal obligation, (a 'Duty of Care') on you, to ensure that they are an 'authorised person' for example a registered waste carrier. Contractors should also provide you with a waste transfer note to demonstrate that you have passed your waste to them. Keep this note safely as you may need to provide evidence of correct disposal practice.

Best Practice Guide

Container cleaning

All containers should be thoroughly cleaned and drained before disposal. In the absence of alternative advice from your disposal contractor, containers should be re-capped and stored upright. Depending on the requirements of the disposal contractor it may be necessary to store plastics and clean cardboard separately. Foil seals and caps may also need to be removed and stored separately. Containers holding dry materials should be thoroughly emptied and if practical "rinsed" and "drained". Paper containers should be folded and placed in a cardboard box, or large paper bag.

For further advice see separate CPA Guide on **Container Cleaning**

Container storage

Cleaned containers should then be placed in a dry secure compound prior to disposal. Some waste disposal contractors may supply suitable skips, bags or bins as part of their disposal service. Agricultural waste may be stored on farm for one year prior to disposal.

Cardboard outers and paper containers

Clean cardboard outers will be acceptable for recycling, but contaminated outers will not. Correctly emptied bags that have been in contact with pesticides e.g. slug pellets, bags from treated seed are non-hazardous waste but may not be suitable for recycling if they are made of mixed materials e.g. plastic coated paper.

Glass, metal and aerosols

Check the label for any specific advice from the manufacturer. Empty container thoroughly and clean where practical. Do not puncture aerosols. Ensure any "washings" are used or disposed of correctly and do not pose any risks to water. A licensed waste disposal contractor will be required; follow their advice on sorting materials prior to disposal.

Enforcement and Penalties

- The Environment Agency will be responsible for enforcement
- Fines will vary depending on the nature of the offence but at Crown Court unlimited fines can be imposed
- Restitution and disposal costs may also be levied on farmers burying waste
- Compliance with the law is part of cross-compliance. You may put your single farm payment at risk if you do not follow the advice and guidance on the law given in such documents as the statutory code of practice for using plant protection products

Scotland

Advice and enforcement on agricultural waste is delivered by the Scottish Environment Protection Agency (SEPA). Burial on farm of empty pesticide containers without a landfill permit is a contravention of the Landfill (Scotland) Regulations 2003 and permits to do so are very difficult to obtain.

Existing controls under the Environment Protection Act 1990 and Waste Management Licensing Regulations 1994 have been extended to agricultural wastes and came into force on 21st January 2006. These mean that the unregistered use of the drum incinerator and open burning on farm of empty, cleaned, pesticide containers will be illegal.

SEPA does not recommend the use of drum incinerators but if farmers plan to use a drum incinerator they must first register (free) this with the local SEPA office.

SEPA has indicated that it is not planning to carry out proactive farm visits in relation to these new requirements, but enforcement will be taken where illegal activity is drawn to their attention.

Cleaned containers to be disposed of via a recycling contractor, by a local authority waste collection service (if available) or by a registered waste disposal contractor.

More detailed advice is available from SEPA

For further advice contact your local SEPA office

Northern Ireland

Advice and enforcement on agricultural waste is delivered by the Environment and Heritage Service (EHS).

The regulatory situation is slightly different to that which applies in England and Wales. Parallel agricultural waste regulations are expected shortly after the England and Wales regulations are introduced. Thereafter a supplementary consultation will consider banning the use of drum incinerators.

However, whilst not yet illegal the practice of burning pesticide containers in drum incinerators is discouraged. The EHS advises that all pesticide containers should be thoroughly cleaned (triple or pressure rinsed) to ensure they are non-hazardous. Non-hazardous pesticide containers should then be disposed of through an appropriately licensed waste management contractor or they can be taken to an appropriately licensed landfill site. Pesticide containers which are inadequately cleaned are likely to be regarded as hazardous and they must be disposed of through a hazardous waste contractor.

For more information contact EHS



This Guide was produced by the Crop Protection Association in consultation with the Pesticides Safety Directorate, Environment Agency, SEPA and DoE N Ireland as part of The Voluntary Initiative.

The Voluntary Initiative is a programme of measure agreed by Government to minimise the environmental impact of pesticides.

www.cropprotection.org.uk

www.voluntaryinitiative.org.uk

