



Compliance Steps Taken By the Ag Chem Industry.... 5 year Response



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Many Organizations and Individuals

- Cooperative effort!
 - CropLife America – Stewardship Committee
 - ACRC - Ag Container Recycling Council
 - EPA - Environmental Protection Agency
 - ARA - Ag Retailers Association
 - MACA - Mid America CropLife Association
 - AASA - American Agronomic Stewardship Alliance
 - NASDA - National Association of State Departments of Agriculture
 - TPSA - The Pesticide Stewardship Alliance
 - State Trade Organization – IFAC, AAI and Others
 - Stakeholder Companies – Chemical and Container

Awareness Campaign Began Early Began in 2007 - 2008



- Developed Brochures, Checklists, Posters, DVDs
- Distributed most to 7000+ retailers
- Shared key facts, dates and reminders.
- Encouraged sense of urgency or at least awareness.

2009 Instructional DVD - Inspect, Test, Organize, Collect, Recycle



- Determine which containers will remain in service,
- And which need disposal.
- Containers must be clean!



- Sent copies of DVD to 6000+ retailers in 2009

Cleared Up Questions with Refillables



Composite IBC



Roto Mold "Asset" IBC

- Both meet DOT/EPA standards for Refillables.
- Both must comply with inspection and testing standards.
- Both must use one way valve, tamper evident devices or both.
- Cleaning standards apply to both equally.
- Manufacturers developed one way valves for both.

Container Manufacturer Support



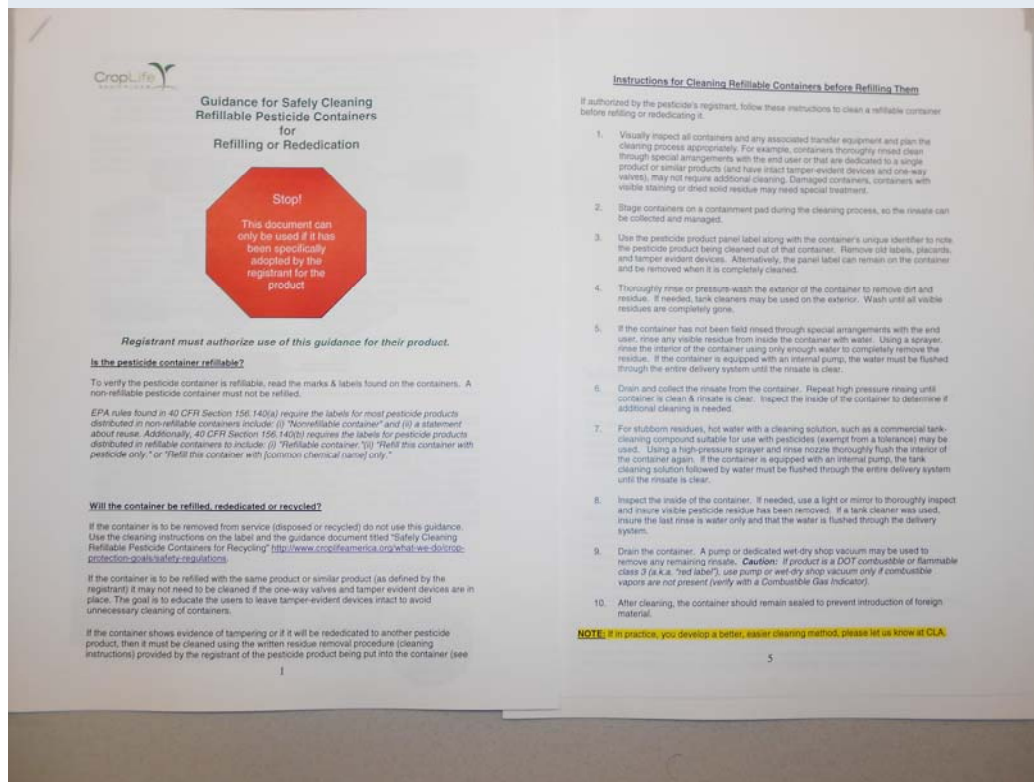
- Several manufacturers including IBC-NA, Schuetz, Snyder, Stainlez and Farmchem developed solutions to solve one way valve, venting, tamper device and after market retrofit demands.
- These devices are now widely available and used.
- Reduces concern about requirements for cleaning prior to refilling when used properly.
- Great industry support from these stakeholders!

2010 – Pilot Iowa Minibulk Recycling Program and Future Programs



- Cooperative pilot with ACRC and AAI
- Followed lead of 2009 IFAC Program
- Confirmed Existing Programs and Recycling Resources
- **Conclusion** - ACRC/CLA will facilitate but not Conduct Future Programs
- Developed to Cleaning Instructions
- Confirmed Recommended Practices
- Documented Pilot Results in DVD as Guide for Others.
- Ag Chem Industry “contact” list provided by ACRC.
- New, stakeholder managed programs are planned for 2011

“Guidance for Safely Cleaning Refillable Pesticide Container for Refilling or Rededication”



- New Brochure From CLA
- Based on best practices of industry
- Provides option for approving end user field rinsing.
- Can be adopted on Repack Agreements
- Exceptions can be added.



New Brochure from CLA “Description of Refillable Containers for Liquid Pesticides”

Not exclusive – A reference guide

Refillable Container Categories

| 1 | 2 | 3 | 4 | 5 |
|--|--|---|--|--|
|  |  |  |  |  |

Goal - Help retailers and ag chem industry understand options

Challenges Needing Attention

- Refillable vs. Non refillable Definition
 - Registrant must “define” a container as Refillable or Non Refillable. This is a Container “*life time*” designation.
 - Most cases are logical.....But it could result in wasting a valuable resource.
 - Now do we address use of the same “type” of container under multiple scenarios? Need common sense approach.
- Serial numbers on registrant “filled” refillables.
 - Is now the time to implement industry “bar coding” system? Most likely. Pilot is being proposed.
- Record keeping requirements and container tracking.
 - Would bar coding standard help? How about electronic data systems?
- Understanding, flexibility and continued cooperation is needed.



Thank You.....Any Questions?