



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and food audits and analysis
F3 - Plants and organics

Grange,
SANTE.F3 TG/mos

FINAL MINUTES

Venue: Virtual meeting

Subject: Pesticide Application Equipment in the context of SUD Evaluation

Date: 01 July 2021, 13:00 to 15:30

Participants: Tsvetana Georgieva; Rex Horgan, Graeme Jones, Christine Meisinger (SANTE F); Paolo Balsari, Jaco Kole, Hannes Wehmann, Jens Wegener, Defays Guillaume (SPISE)

The meeting was performed based on a request by SPISE (Standardized Procedure for the Inspection of Sprayers in Europe), where the main idea was to discuss SPISE proposals on policy options with regard to PAE, in the context of SUD Evaluation. SPISE have also provided a written feedback, in the process of public consultation.

Since 2017, such bilateral meetings have been taking place on an annual basis, with no meeting in 2020 due to the COVID-19 pandemic. The last bilateral meeting was performed on 13 May 2019.

During the meeting, presentations were made by both sides, SANTE F3 and SPISE.

The presentation of DG SANTE F provided a summary on audit and non-audit activities between March 2019 and July 2021, and MSs feedback on policy options with regard to pesticide application equipment (PAE). The presentation also highlighted the conclusions made in the Commission reports to the EP and the Councils of October 2017 and May 2020, where PAE was identified as one of the main weaknesses. The presentation also focused on existing harmonised standards (EN/ISO) for testing of PAE in use, and MSs' proposals on most urgently needed harmonised standards.



F3 Presentation PAE
Feedback by MSs.pptx

The presentation given by SPISE provided an overview on the following aspects:

- SPISE Technical Working Groups activities completed and in progress;
- SPISE position on PAE related policy options;
- Activities on harmonised ISO/EN standard.

The presentation provided information on some future activities, including the new SPISE inquiry on PAE inspection activities in MS and the planning of the SPISE 8th Workshop.



SPISE
Presentation.pptx

In response to a question by SPISE with regard to policy options and the way forward, it was explained by SANTE F that both MSs and stakeholders have already provided feedback, and the Impact Assessment (IA) is on-going. The IA would consider costs and benefits involved, which the European Commission (EC) would use then in their legal proposal. It was shared by the EC that, with regard to pesticide application equipment (PAE), the policy options to be considered cover including the PAE within the scope of the Official Controls Regulation, testing of new PAE and PAE register. The EC also explained that there might be an issue related to new PAE testing, which is linked to the Machinery Directive. SPISE representatives were reminded that submitting the EC legal proposal is the start of the process, which would be then followed by negotiations in the Council and Parliament.

SPISE opinion was expressed that registration of PAE should become a legal obligation, as well as testing of new PAE items. To support their second point, a reference was made to a survey from BE, which showed 3 % failures of new PAE to pass successfully a test within the first 3 years after purchase, and respectively 5 % failures for PAE within 5 years after purchase. In order for this to be taken into account by the EC, SPISE representatives were asked, and they agreed to provide the survey results, as well as any further supporting data for this policy option, by September 2021 at the latest.

Another point, raised by SPISE, was that PAE owners are not so well aware of PAE calibration, and the benefits of using drift reduction nozzles, as PPP professional users get only a limited training on this topic. In their opinion, there are up to 80 % losses of pesticides during application due to different reasons, one of these being the improper calibration.

Further aspects raised by SPISE, which are seen as problematic, included the following:

- The need of more detailed training of PAE owners/users on the proper use of PPPs, including maintenance and calibration of PAE;
- Harmonised (EN/ISO) standards for testing of PAE in use (According to SPISE's estimate, around 2 Mio PAE items in use in the EU are covered by harmonised

standards, whereas there are no harmonised standards for specific PAE items, whose number is around 500,000);

- In the absence of harmonised standards, existing SPISE Advices to be used as Guidelines for testing of PAE in use; on this aspect, SPISE asked for support from the EC to translate available SPISE Advices in MSs' national languages, to encourage MSs to increase their involvement in dissemination of SPISE Advices, as well as to encourage MSs to nominate participants/members of CEN Technical Committees, thus getting involved and more active in developing further harmonised standards;
- Use of drones for PPP application is seen as a high risk operation due to different reasons, including the high concentration of PPP tank mixtures, and the risk of crashing down; in their opinion, requirements to be met by drones should be included in a standard, including requirements for the material of tanks, cleaning up after PPP application etc.;
- The need to consider how to manage old PAE items disposal (according to SPISE estimate, an average of 2 Mio PAE items in the EU, with an average life of 20 years, which results in 100.000 PAE items a year reaching end of use);
- The need for the current Annex II to the SUD to be revised, where SPISE have already developed a draft document to replace it;
- The need for the current Annex I to be amended, so that PAE related topics/aspects to be better reflected;
- Inspection quality, which varies from one MS to another, and from one inspection body/workshop to another;
- Links between SUD and Machinery Directive; PAE market surveillance is seen as either lacking or unsatisfactory, especially in the case of small-scale PAE manufacturers;
- The need of a specialised BTSF programme on PAE maintenance and adjustment/calibration.

SPISE participants informed the EC that they plan to organise their next workshop in July 2022 (indicative dates: 06 to 08 July), and they invited SANTE F to nominate a participant.

SPISE also asked for another bilateral meeting with the EC/SANTE F in the second half of 2022.

(Signed)

Tsvetana GEORGIEVA