Current implementation of inspections of pesticide application equipment in the EU following SUD requirements

European Commission
Directorate F of DG Health and Food Safety
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Overview

1. Directorate F of the DG Health and Food Safety of the European Commission


3. Implementation of Article 8 in Member States (MSs):
   - National Action Plans (NAPs)
   - Audit series 2012-2014
   - Audit series 2015
Directorate F – former FVO

- Responsible for verifying compliance with EU requirements
- Food safety, animal health, animal welfare and plant health
- Medical devices, active pharmaceutical ingredients
- Including sustainable use of Plant Protection Products (PPPs)
- Active in:
  - Member States
  - Candidate Countries
  - Third Countries
Directorate F
Health and Food Audits and Analysis
– 7 units

F1
F2
F3: Plants and Organics
F4
F5
F6: Internal Controls and Services
F7: Country Knowledge and Work Programme
AUDIT/MISSION ACTIVITIES

Pesticide Controls:
• Authorisation
• Marketing and use of PPPs
• Pesticide residues
• Sustainable use of PPPs
The F3.2 Pesticides and Biocides team...

- Jan, Dara, Tsvetana, Piroska, Gonzalo
- Plus National Experts
AUDITS

- Legal basis of audits is Reg. 882/2004
- Pre-audit/mission documents (Plan and Questionnaire)
- Audit reports are published:
  http://ec.europa.eu/food/audits-analysis/audit_reports/index.cfm
TYPICAL ITINERARY

At central level

- Opening meeting
- Authorisation system of PPPs reviewed
- Overall control system of PPPs reviewed
- Closing meeting

Two regions visited

- Meeting with regional CA
- Observe an inspection at a manufacturer/distributor/retailer and at a user
AUDIT REPORT

• Legal Requirements
• Findings
• Conclusions
• (Recommendations)
• Draft Report
• Comments / (Action plan)
• Final Report
• OVERVIEW REPORT of audit series
NATIONAL EXPERTS

- MS staff involved in authorisation/enforcement
- An opportunity to learn
- An opportunity to share ideas
How Directorate F adds value....

- **MS**
  - MS specific weaknesses/inefficiencies identified - contribution to improvement

- **EU**
  - Common weaknesses
  - Issues with interpretation of legislation
  - Gaps in legislation
  - Best practices
  - Exchange of ideas
  - BETTER EU WIDE CONTROLS

**Subject matter** - Directive establishes a framework to achieve a sustainable use of pesticides by reducing the risks and impacts of pesticide use on human health and the environment and promoting the use of integrated pest management and of alternative approaches or techniques such as non-chemical alternatives to pesticides.

**Provisions:**

- Training, sales of pesticides, information and awareness-raising
- Pesticide application equipment
- Specific practices and uses (e.g. IPM)
- Indicators, reporting and information exchange
Implementation of Article 8 in MSs – National Action Plans (NAPs)-I

- NAPs were received from Member States by early 2014 and the Commission analysed these plans.
- NAPs must be reviewed at least every 5 years.

- Articles 8 (1) and (2) - ensure that pesticide application equipment in professional use shall be subject to inspections at regular intervals.
  - 26 NAPs include arrangements to ensure professional application equipment is tested as required.
  - Only 6 NAPs explicitly state that the timelines and quantitative targets will be achieved i.e. 100 % of equipment in use to be tested by 26th November 2016.
Implementation of Article 8 in MSs - NAPs-II

- **Article 8 (3)** - derogation from Articles 8 (1) and (2) - apply different timetables and inspection intervals and exempt handheld pesticide application equipment or knapsack sprayers.
  - 13 MSs - no plans to test knapsack sprayers, 4 plan to test knapsack and 11 NAPs not clear (9 - no reference to a derogation).

- **Article 8 (4)** - verify that pesticide application equipment satisfies the relevant requirements listed in Annex II.
  - 19 MSs - No direct reference to either Annex II or EN 13790.
  - 5 NAPs specifically refer to Annex II and 4 to comply with EN 13790.

- **Article 8 (5)** - conduct regular calibrations and technical checks of the pesticide application equipment.
  - 14 NAPs address this issue.
Implementation of Article 8 in MSs - NAPs-III

- Article 8 (6) - designate bodies responsible for implementing the inspection systems, establish certification systems for verification of inspections and recognise the certificates granted in other MSs.

- 21 MS indicated in their NAPs to have designated a body or bodies for implementing the inspection system.
- 12 NAPs propose to establish certification systems.
- 10 countries address the issue of mutual recognition of certificates from other MS to various extent.
Implementation of Article 8 in MSs - NAPs-IV

**Good practice:**

- More frequent testing of application equipment, particularly equipment with a heavy workload.
- Shorter inspection deadlines for train and aircraft mounted spraying equipment.
- Defined lists of, and plans to, include specific equipment other than boom and blast sprayers in equipment testing programme.
- Inclusion of pneumatic precision drills, used to drill pesticide treated maize seed, in equipment testing programme.
- Mutual recognition of sprayer testing certificates from other EU MS.
Implementation of Article 8 in MSs

• Individual aspects of the SUD were covered in two series of audits carried out by Directorate F.

• These two series have shown that Member States had made good progress on the implementation of measures to implement SUD.
Implementation of Article 8 in MSs audit series Jan 2012 – June 2014 -I

Aspects covered:

• the authorisation of PPPs and official controls on the marketing and use of PPPs under Regulation (EC) No 1107/2009 and Directive 2009/128/EC;

• the implementation of official controls of PPPs at growers, as specified in Regulation (EC) No 882/2004;

• follow-up to recommendations of previous audits with the same scope.
Implementation of Article 8 in MSs audit series Jan 2012 – June 2014–II

Aspects of SUD covered:

✓ training and certification of pesticide distributors and end users;

✓ handling, storage, transport of PPPs + handling, storage and disposal of remnants and empty packages;

✓ pesticide application equipment;

✓ IPM
Implementation of Article 8 in MSs audit series Jan 2012 – June 2014-III

Outcome – pesticide application equipment:

- 19 MSs visited
Implementation of Article 8 in MSs audit series Jan 2012 – June 2014–IV

Outcome – pesticide application equipment:

In **11 MSs**:

- legal requirements in the national legislation in place;
- control measures undertaken;
- calibration certificates and plates / labels checked during routine inspections at growers.
Implementation of Article 8 in MSs – audit series Jan 2012 – June 2014-V

**Outcome – pesticide application equipment:**

In the remaining 8 MSs:

- **legislation awaited** OR legal requirements in place, but **checks** of the application equipment **not yet introduced**;

- **time frames provided** – in compliance with Directive 2009/128/EC, with the exception of one MS, where no deadlines fixed and no idea about calibration facilities.
Implementation of Article 8 in MSs audit series in 2015-I

- 7 MSs visited (IT, AT, BE, FR, EL, HR and NL)

- **Objectives:**
  - the implementation of requirements of Regulation (EC) No 1107/2009 and Directive 2009/128/EC,
  - follow-up to recommendations of previous audits with the same scope,
  - with focus on manufacturers, importers and re-packers of PPPs.
Implementation of Article 8 in MSs audit series in 2015-II

Outcome – pesticide application equipment:

Most MS controls included sprayer testing (to meet the deadline of November 2016).
Future Plan regarding pesticide application equipment

• Implementation of SUD – Member State responsibility
• Directorate F of DG Health and Food Safety - prioritisation
• F3.2 pesticide sector – various and broad activities (pesticides, SUD, biocides....)
• 2017-18:
  • Managing the SUD dossier
  • SUD implementation - a preliminary desk study followed by fact finding missions on the ground
Thanks for your attention!
Questions.....