Session 1

Inspection of brand new sprayers

Chairmen: E. Gil, C. Schulze Stentrop
Introduction – session 1

Program:

12:00 – 12:10 SPISE position and proposal
   (Gil, Schulze Stentrop)

12:10 – 12:30 Inspection of new sprayers before delivery
   (Schulze Stentrop, Hloben)

12:30 – 12:50 Inspection of new sprayers – defects following EN-ISO 16122 (K. Herbst)

Discussion
Directive 2009/128/EC

(13) Since Directive 2006/42/EC of the European Parliament and of the Council of 17 May 2006 on machinery (4) will provide for rules on the placing on the market of pesticide application equipment ensuring that environmental requirements are met, it is appropriate, in order to minimise the adverse impacts of pesticides on human health and the environment caused by such equipment, to provide for systems for regular technical inspection of pesticide application equipment already in use. Member States should describe in their National Action Plans how they will ensure the implementation of those requirements.

Article 3 - 4. ‘pesticide application equipment’ means any apparatus specifically intended for the application of pesticides, including accessories that are essential for the effective operation of such equipment, such as nozzles, manometers, filters, strainers and cleaning devices for tanks;

PESTICIDE APPLICATION EQUIPMENT

Article 8

Inspection of equipment in use
1. Member States shall ensure that pesticide application equipment in professional use shall be subject to inspections at regular intervals. The interval between inspections shall not exceed five years until 2020 and shall not exceed three years thereafter.
2. By 14 December 2016, Member States shall ensure that pesticide application equipment has been inspected at least once. After this date only pesticide application equipment having successfully passed inspection shall be in professional use. New equipment shall be inspected at least once within a period of five years after purchase.

6. Each Member State shall establish certificate systems designed to allow the verification of inspections and recognize the certificates granted in other Member States following the requirements referred to in paragraph 4 and where the time period since the last inspection carried out in another Member State is equal to or shorter than the time period of the inspection interval applicable in its own territory.
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1. According to the machinery directive 2009/127/EC - EN ISO 16119 must be accomplished by manufacturers, but this fact doesn’t guarantee the accomplishment of ISO 16122

2. Some manufacturers have already very good internal quality assurance process, which include testing of components and complete not far away from EN ISO 16122

3. There is an important lack of knowledge among small – medium manufacturers, which difficult the accomplishment of standards

4. CEMA supports SPISE and EN ISO 16122 establishment, and also maintenance and accurate use of equipment
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6. It is necessary to separate “in-factory” testing than “in-factory” inspection

7. A harmonized certification document / sticker as a type of test report for new sprayers must be developed. A mutual recognition document is needed

8. Manufacturers will provide a ‘certificate of inspection’ (CoI) identifying the conformity with EN ISO 16122 for the serial number machine with which the CoI is being shipped

9. In the case of new sprayers, manufacturers would like to work with a system which gets the same level as “at-factory” testing to show that the requirements of the EN ISO 16122 standard are fulfilled
After the last TWG meeting (Grembloux, March 2016) was decided to contact officially with CEMA. A letter from SPISE was officially sent to Mr Richard Markwell, President of CEMA, where main aspects were submitted as:

…Considering the previous scenario, the SPISE Community proposes to CEMA that, in order to avoid all the above mentioned problems, every single sprayer should be checked in the factory (dealer, distributor), following the harmonized standard EN ISO 16122-series. It is clear that this harmonized standard should be adopted for new sprayers. This procedure can help the manufacturers to guarantee the total accomplishment of the requirements that will be required to the farmer…”

May 2016
Regarding the idea of a mandatory inspection of new sprayers before being placed on the market, it is important to underline that **this is something that would not be in conformity with applicable EU rules**. As you will be aware, the EU’s Machinery Directive 2006/42/EC is based on the **principle of self-declaration**. The DoC, the Declaration of Conformity, is in fact linked to an individual sprayer. For this reason, vehicle manufacturers have, or should have, **adequate production quality assurance schemes in place**. Various technical features of a sprayer can be adequately tested as part of the production process, including quality assurance, and therefore **do not require re-testing following assembly**. In this context, it should be noted that the **harmonised standard EN ISO 16119** used to demonstrate compliance with the Machinery Directive is **more stringent than EN ISO 16122**.
Actions from TWG 1

SPISE leaflet
How to choose a good sprayer - Guideline to fulfil the EU 127/2009/CE