

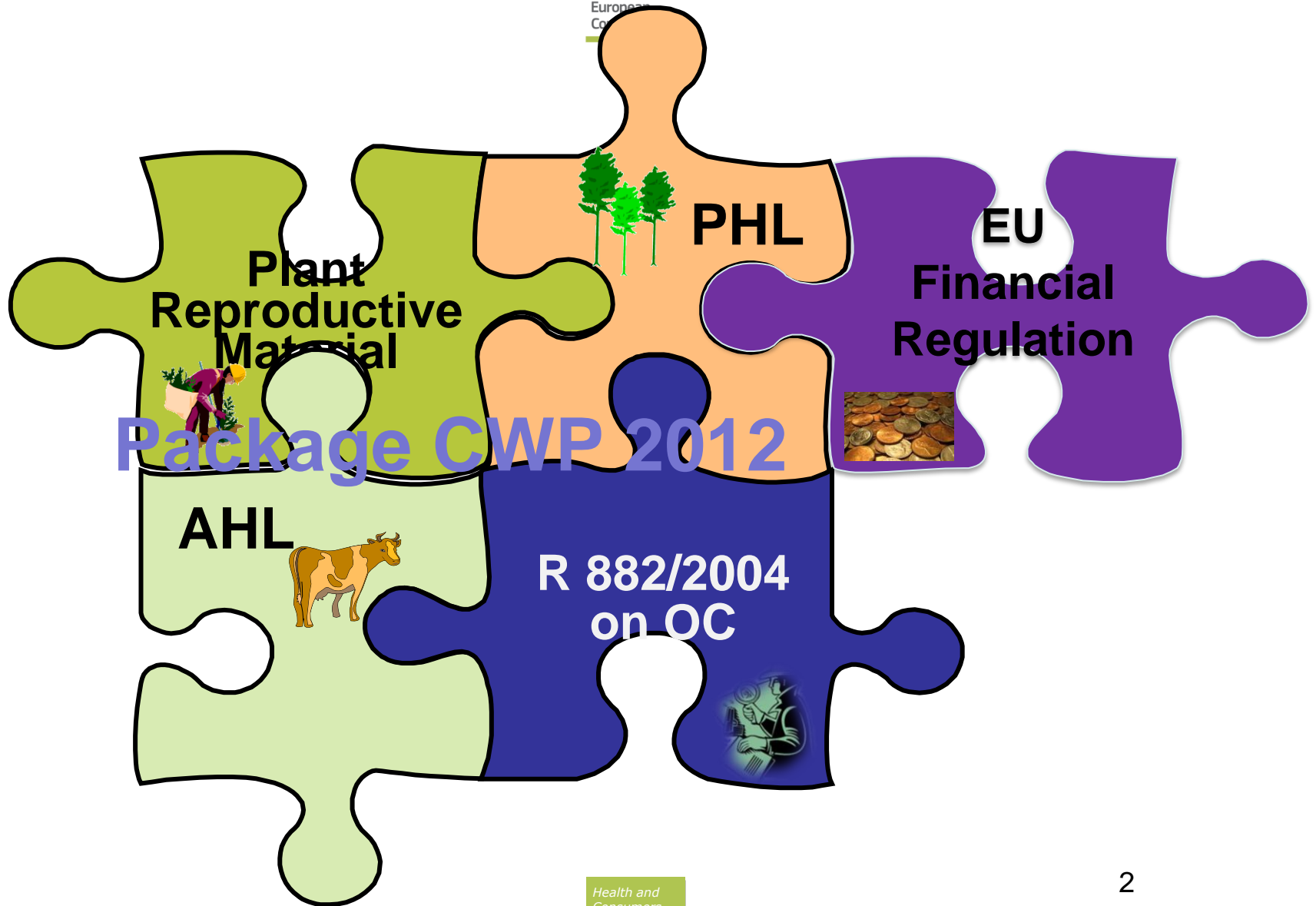
# Regulation on official controls and inspektion of sprayers in Sweden

Johan Wahlander  
Swedish Board of Agriculture





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However, there are some areas Sweden would like to exclude from the scope:

- Forest reproductive material
- Inspection of pesticide application equipment



# Inspections in Sweden 1

The average Workshop inspect 67 sprayers on one year

## Density of sprayers

NL, DK (and Scania) - 1 sprayer on 2 km<sup>2</sup>

Swedish County Jämtland – 1 sprayer on 1268 km<sup>2</sup>

Norrbotten - 1 sprayer on 2355 km<sup>2</sup>



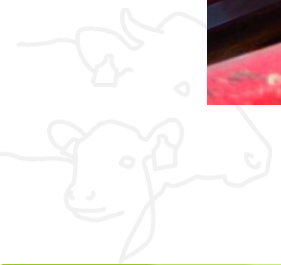
# Inspections in Sweden 2

If a proper place can be found most inspections are done outside of the workshop



# Inspections in Sweden 3

The inspectors make repairs and advisory services are also included



# Inspection of sprayers in its current form cannot be carried out under the control regulation:

- Neither size of sprayer inspections nor the use of pesticides is large enough to support the administrative structure of the regulation of official controls. Too high costs need to be transferred to the customer.
- It is unclear if the control regulation allows free pricing.
- The fee for an inspection of sprayers in use regulated by the control regulation would affect the number of sprayers and thereby diminish the market

# The importance of independence

- The possibilities to implement inspections outside a workshop decreases. The demand that inspections should be free from any conflicts of interest may make repairs and advisory services impossible
- The control regulation does not provide any guidance as to how inspections should be done in practice. The administrative control adds no positive value to the business. Planned improvements in quality assurance will be impossible





# Article 159

## *Amendments to Directive 2009/128/EC and related transitional measures*

1. Directive 2009/128/EC is amended as follows:

(a) in Article 8, paragraph 1, the second subparagraph of paragraph 2 and paragraphs 3, 4, 6 and 7 are deleted;

(b) Annex II is deleted.

2. Paragraph 1, the second subparagraph of paragraph 2 and paragraphs 3, 4 and 6 of

Article 8 and Annex II of Directive 2009/128/EC shall continue to apply until the date to be determined in the delegated act to be adopted in accordance with paragraph 3.

3. The Commission shall be empowered to adopt delegated acts in accordance to Article 139 concerning the date on which the provisions referred to in paragraph 2 shall no longer apply. That date shall be the date of the application of the corresponding rules to be established pursuant to the delegated acts provided for in Article 22 of this Regulation.

# Article 159

- This official proposal (about article 159) creates difficulties to give straight answers to companies that want to expand their business. Since an expansion is necessary to provide access to inspections for all plant protection users, straight answers is crucial to implement mandatory inspections.

# Impact assessment?

If inspection of sprayers, despite our arguments, should be included in the regulation on official controls, the decision should be based on an impact assessment. Our assessment is that the cost of the regulation for corporate profitability, the environment and working conditions for all personal and, above all, increased administration at all stages is not offset by improvements.

# Message of this presentation

”Beware” or be aware of the work done to expand the scope Regulation on official controls

Sweden would be happy for support to take away inspection of sprayers in use from the Regulation on official controls