Session 1

Inspection at regular intervals – Inspection of new equipment

H. Ganzelmeier
Conclusions of session 1

- **Topics discussed**
  - Inspection of equipment without standards will come as soon standards are developed
  - Sprayers tested at factory not necessary fulfill the EN 13790 when they are delivered to user. Transport, changes in nozzles etc.
  - Sprayers are completely assembled, re-assembled after transport, assembled at dealers after clients specification
  - LT: Burdon for inspection on retailer not farmer
  - Will proposals in Spise have any effects in FWD or MS NAP´s?
  - Initial inspections may overlap – conformity assessment
  - EN 12761 and EN 13790 will be developed parallel
  - Self-certification of equipment verifies the conformity with EN 12761
  - Sticker confirmed that equipment fulfill EN 13790
  - Biocides will follow after PPP
  - Spise have to be careful not to recommend to high levels e.g. intervals
Topics discussed

- The interval is free for MS to choose, as long as the 5/3 years are not exceeded. MS can have longer intervals in beginning.
- Assembling components to complete sprayers puts responsibility for MD on producer of the machine not the parts.
- MD supported by harmonized standards published in OJ. Machines complying may be placed on market.
- Norway: discussed with manufacturers. Initial requirements on new sprayers.
- Poland: how can we motivate farmers to have a brand new sprayers.
- SE: We have to find ways how to have quality on delivered equipment???
Session 1

- **Draft proposal supplementation**
  - Make more clear in the text ( ) that times and intervals are examples! Time can be 1-5 years, up to MS to decide.
  
- **Listing of subject to be dealt with SWG**
  
  - What are national additional regulations in MS? Collect information and inform producers!
  
  - SE: We have to find ways how to have quality on delivered equipment. Manufacturer.
  
  - Clarify possible PAE derogations and exceptions from FWD
• Listing of subject to be dealt with SWG
  – What are national additional regulations in MS? Collect information and inform producers!
  – SE: We have to find ways how to have quality on delivered equipment. Manufacturer.
  – Clarify possible PAE derogations and exceptions from FWD
Member states may apply different time tables and inspection intervals

B. Huyghebaert
Session 2

Conclusions of session 2

• Topics discussed
  – Risk assessment (Human Health/Environment):
    • Missing procedure & protocols.
    • Need for harmonisation, standards
    • PrEN 12120 on Risk Assessment would be useful
  – Other timetables and intervals:
    • Derogation = lengthening of the deadlines defined 8/1 and 8/2.
    • Without standardised inspection protocols => derogation (postpone the deadlines).
  – Inspection protocols for other PAE than dealing with EN 13790:
    • Testing of sprayers in greenhouses (I).
    • Looking at the forward speed, volume and penetration (I).
    • Equipment demanding dynamic test: aircraft, train (N).
Conclusions of session 2

• Topics discussed
  – User’s Information and training:
    • More efficient for handheld PAE and knapsack sprayers than an inspection.
    • Inspection for handheld PAE and knapsack sprayers could given a false impression of security (because of missing calibration).
  – Other classification scheme of the PAE
    • No derogation, derogation of timetable/intervals and exemption.
    • Additional PAE of very low scale of use = undefined black box!
    • Fogger are considered as PAE not used for spraying
Conclusions of session 2

• Some conclusions
  – Article 8/3 is very important
  – Need clarification:
    • risk assessment,
    • additional PAE of low scale of use,
    • classification scheme of all the PAE,
    • information and training of the user.
§3(1) By way of derogation from paragraphs 1 and 2 and, following a risk assessment for human health and the environment including an assessment of the scale of the use of the equipment, Member States may:

- ...
- ...
- ...
- ...
- ...
- ...
- ...
- ...
- ...
- ...
- It is still open and has to be clarified how a previous assessment of risk and scale of use should be carried out
§3(a)(1) Member States may:
apply different timetables and inspection intervals to pesticide application
equipment not used for spraying pesticides, to handheld pesticide application
equipment or knapsack sprayers and to additional pesticide application
equipment, which shall be listed in the national action plan foreseen in Article 4,
that represent a very low scale of use.

- 4) PAE which is not used for spraying pesticides has to be inspected
  at least once (e.g. within seven years after the date of entry into
  force of this Directive).

- All PAEs which are not used for spraying pesticides according to article 8(2) have to
  be inspected at least once within seven years after the date of entry into force of this
  Directive.
Discussion – Proposal for an uniform enforcement

§3(a)(2) The following additional pesticide application equipment shall never be considered as constituting a very low scale of use:
(i) spraying equipment mounted on trains or aircraft;
(ii) boom sprayers larger than 3 m, including boom sprayers that are mounted on sowing equipment;

• ...  
• ...  
• ...  
• ...  
• ...  
• PAE for spraying according to article 8(3a),(i) & (ii) shall be subject to inspections according to article 8(1) because it will never be considered as constituting a very low scale of use.
Discussion – Proposal for an uniform enforcement

§3(b) Member States may: exempt from inspection handheld pesticide application equipment or knapsack sprayers. In this case the Member States shall ensure that operators have been informed on the need to change regularly the accessories, on the specific risks linked to that equipment, and that operators are trained for the proper use of that application equipment in accordance with Article 5.

• 5) Handheld PAE or knapsack sprayers (e.g. are excluded from the inspections at regular intervals).

• ...
• ...
• ...
• ...

• With this paragraph the option laid down in article 8(3) is used in order to exempt some equipment models from inspection.
• It is still open and has to be clarified how and in which cases the operators have to be informed on the need to change the accessories regularly and how to train the operator according to article 5 of this Directive.
• Listing of subject to be dealt with SWG:
  – Definition of risk assessment?
  – Ask for standardisation in this field?
  – Clarify the classification scheme of the sprayer (taking into account the particularities of the countries)
  – listing of PAE already inspected in the MS
  – listing of PAE that have to be inspected
  – comparison with the priorities list established by the convenor of the CEN/TC144/WG3 for the revision of the EN 13790 series.
Conclusions of session 2

• **Topics discussed - conclusions**
  – Risk assessment missing procedure & protocols,
    (Human exposure or/ and pollution of environment?)
  – Fogger not a spraying equipment ???
  – See Bruno list (most important)
  – Testing of sprayers in greenhouses in Italy
  – Equipment demanding a dynamic test (N)
  – In Italy they also look at the forward speed, volume and penetration.
  – Timetable and interval (not longer than 5 years before 2020, not longer than 3 years after 2020)
  – Standard EN/ISO 12100 on risk assessment
  – Training should be more highlighted for knapsack sprayers & also include how to ensure correct dose
Session 3

Inspections shall verify that PAE satisfy relevant requirements

P. Harasta
Conclusions of session 3

• Topics discussed
  – Presentation of article 8.4
  – Inquiry 13790 respect vs national regulations
  – Standards applicable on different types of machines
  – Possibility to use 13790 (or parts) for other similar sprayers (i.e. German example)
  – Takes time to develop new standards ➔ use of parts already available
  – But impossible to realize dynamic test without specific procedure
  – Necessary to harmonize the categories (at least)
  – But maybe difficult to read for inspectors if they do not have the specific procedure
  – Possibility to simplify the requirements
Some conclusions

- We shall do with what is available from now: we do not have time to spend for waiting and waiting....
- Mr Osteroth proposal should be evaluated as a way to accelerate the updating standardization process.
Session 4

Regular calibration & technical checks

E. Nilsson
• **Some conclusions**
  
  • Technical checks should be done annually and after repairs and technical changes.
  
  • Calibration should be done annually and after technical changes which also may be caused by changes of e.g. weather, crop or development stage.
  
  • Calibration should be km/h, l/min and airflow (if required).
Session 5

Mutual recognition....

J. Kole
Topics discussed & Some conclusions

- SPISE recommendations for mutual recognition were discussed, some improvements were suggested
  - Need for EU database?
  - misuse of data,
  - color-code for sticker
  - harmonized test report,
  - mutual recognition is required on the basis of FWD, some regulatory questions could be relevant, each MS have to provide inspections for all PAE (S: airplane?), ...
  - Identification of PAE (test report & sticker!!!)
  - minor defects (BE: 3 categories, defined in EN 13790?)
  - Is allowed to use rejected PAE (BE: yes)
  - Using of inspected PAE in other MS
  - definition of EN 13790 requirement for PAE is task of CEN/WG3
  - SPISE recommendation send to MS for improvements (task for SWG!!)

but SWG should be able to make recommendations!!!!!!!!!!!!!!!!!11
Session 6

Authorization and monitoring the workshop….  

P. Balsari
Conclusions of session 6

- Topics discussed

  a) Criteria for rejecting the PAE
  b) Criteria for authorizing the Workshop
  c) Criteria for monitoring the inspection activities

The evaluation of sprayers inspection procedure in Italy

The inquiry on current state of the art
Some conclusions

Criteria for rejecting the PAE

The criteria for sprayers rejecting is that they do not fulfill the requirements of the EN 13790 with the exception of the minor defects that have been defined in SPISE Session 5

Criteria for the Workshop Authorization

- Appropriate inspector trained background
- Suitable Workshop structure to prevent weather influences and environmental damage
- Suitable Workshop instruments (following EN 13790 requirements or certified ENTAM)
• **Some conclusions**

**Criteria to cancel Workshop Authorization**

Not fulfill the inspection activity requirements

**Criteria to give and to withdraw the Workshop Authorization**

Basis could be the documents already in force in some countries where inspections are mandatory since several years
Some conclusions

Workshop inspection activity monitoring

- Should concerns both technical and administrative requirements
- Should be made by National Authorities or by ISO 9001 or ISO 17025 certified organisations with a frequency of not more than 24 months (ENTAM Certification?)
- Workshop monitoring should be harmonized also through the creation of an EU database (Managed by SWG or ENTAM) with the name, address and other specifications of the authorized Inspectors and Workshop
Session 6

- **Some conclusions**
  - Rejecting of PAE
    - Minor defects
  - Authorization and monitoring of workshop (facilities & procedure)
    - Control/Supervision is required (request of mutual recognition)
    - Certification of the whole procedure-not each single workshop- is useful
    - ENTAM-certification of test bench is established
    - ISO 9001 is too complicated, SPISE or ENTAM is more appropriate
    - List for inspectors for monitoring workshops (SWG topic for future

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Thank you for your attention