



# Industry Proposal on the Inspection of Sprayer in Use (Preliminary Inspection)

## The position CEMA

- Christoph Schulze Stentrop  
Product manager - HARDI International
- Dr Peter Hloben (John Deere)  
CEMA PT 24 working group

# Presentation overview

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## Industry Proposal on the Inspection of Sprayer in Use (Preliminary Inspection)

- Who is CEMA
- Situation
- Problems
- CEMA Proposed solution
- Challenges and conclusion



- The development and production of agricultural machinery is among the most dynamic and innovative industry sectors in Europe
- > 50 years CEMA has been providing an interactive platform to manufacturers of agricultural machinery to formulate common industry positions and work towards a higher degree of European harmonization in the sector
- 10 national trade associations
- 4500 manufacturers of agricultural equipment consisting of large multinational companies as well as numerous small and medium-sized enterprises
- > 450 different types of machines – tractors, combines, application technology
- Turnover of €26 billion and provides employment for 135.000 persons directly (+125.000 indirectly)
- CEMA members produce more than 90 % of the new sprayers in EU

# CEMA – SPISE

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- CEMA supports the current practice for the standardized inspection of sprayers in use according to the requirements of EN ISO 16122, overseen by Member State authorities and undertaken by certified testers.
- CEMA members deliver products according to EN ISO 16119.
- CEMA works active in the SPISE.
- CEMA considers not only the original performance of the spraying equipment, we also support its use, care and maintenance.
- CEMA have direct access to the dealer network - dealers are offering the test to the end-users in most member states today - we are in daily contact.

# The Situation

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- The leading European sprayer manufacturers represented by CEMA have always worked along a clear vision and strategy to ensure the safety and health of the operator and the protection of the environment, while satisfying the customer demands for functionality, versatility, operability, etc.
- In addition to the efforts in product development the industry, together with the other stakeholders, has drafted the harmonised European standard EN ISO 16119 for placing sprayers on the EU market.
- The second step is the harmonised European standard EN ISO 16122 for inspection of sprayers in use. Standardising the requirements and methods for inspection of sprayers in use takes into consideration not only the original performance of the sprayer.
- Also its use, care and maintenance, this is a logical link to ensure the continued benefit arising from the supply of new sprayers of good quality.

# The Situation

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- What are the current steps in the process of approval and in-use inspection today:
- The self-certification (module A) according to the Machinery Directive, which is usually based on the EN ISO 16119, is an obligation for the manufacturer. It is part of the declaration of conformity and it is identifiable on the machine by the CE mark.
- The Declaration of Conformity is the formal and legal statement addressed to authorities that the individual machine complies with the Machinery Directive under self-certification.
- The inspection of sprayers in use according to EN ISO 16122 (formerly EN 13790) must be carried out by an authorized test centre. The first inspection must take place not later than 3 / 5 years after placing on the market.

# Problems

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- Compliance for new sprayers with EN ISO 16119 includes higher performance requirements than EN ISO 16122
- BUT some customers, dealers and importers want to be doubly sure that the new sprayer will pass the first inspection for sprayers in use. Therefore they prefer that the new sprayer will be delivered with the certificate showing compliance with EN ISO 16122 (national test report and decal).
- The first inspection, according to EN ISO 16122, of the sprayer can be offered by the manufacturer as an additional service, i.e. in terms of an optional item in the product catalogue (as already done today in various Member States), BUT there is no mutual recognition of national test reports across all member states.
- Individual sprayer inspections for each Member State would be the worst case scenario, difficult or impossible to be managed and therefore it would be rejected by the industry.

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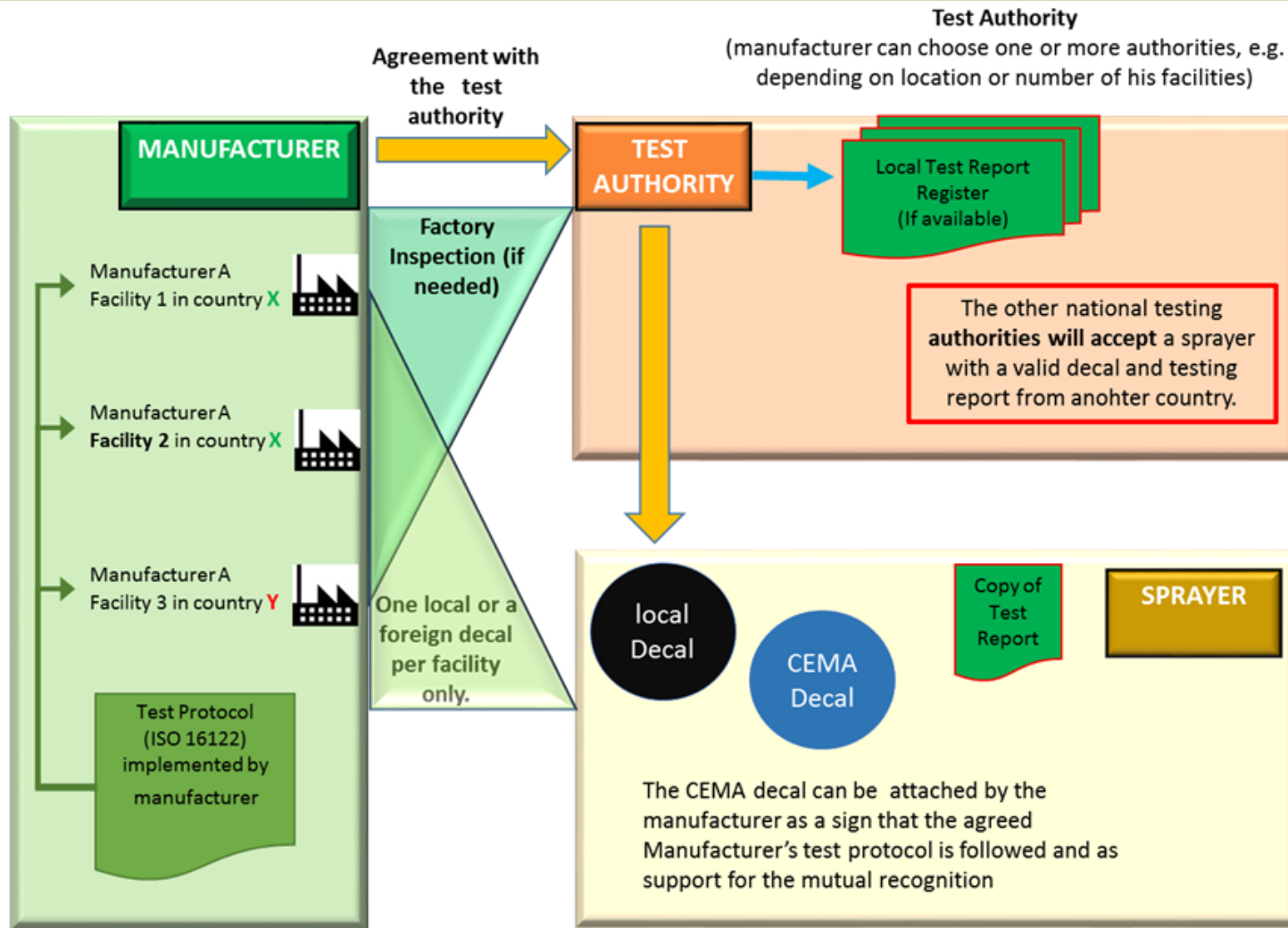
# Proposed Solution

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- The (first) inspection is offered by the manufacturer as an option – it is not an obligation. It is up to each individual customer to decide whether or not he likes to accept and to buy this offer as option.
- Upon a request, the manufacturer shall be approved as an authorized test centre by an authorization body of one Member State, in order to carry out officially recognized sprayer inspections.
- The test reports and certificates issued by any authorized test centre (including an authorized manufacturer) shall be mutually recognized. This mutual recognition is a mandatory requirement according to the Sustainable Use of Pesticides Directive.



# Proposed Solution



# CEMA Approach in detail

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- There is a test protocol based on the ISO16122-2 / ISO 16122-3 adopted by a manufacturer. The test protocol can be specifically written for the manufacturing facility (tailored to the manufacturer depending on the level of integration of the Certificate of Production into his manufacturing processes). It is referred to as the manufacturer's test protocol.
- The manufacturer can choose for its authorisation as test centre an authorisation body which is located at the manufacturer's facility place (county, province or state), or it can be an authority from one of the different EU member states.
- The selected authority is asked to verify whether the Manufacturer's test protocol is fulfilling the requirements of ISO 16122-2 / ISO 16122-3 and whether it can be agreed, with or without certain modifications, as equivalent of the test protocol from the testing authority. The authorisation as test centre is dependent on this agreement.

# CEMA Approach in detail

- The selected authority may visit and inspect the manufacturing facility (to check items related to ISO16122-2 / ISO 16122-3 only).
- The manufacturer will conduct the testing of the sprayer according the test protocol and will be authorized to issue the testing report and place the local authority decal on the machine.
- The manufacturer will pay fees related to the approval as test centre.
- The different national schemes (authority, testing records and decals) will be kept as they are today.
- The CEMA decal can be attached by the manufacturer as a sign that above procedures are followed and as support for the mutual recognition.



# Summary

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- The placing on the market and in-use compliance of sprayers is covered by European legislation.
- Some customers, dealers and importers want to be doubly sure that the new sprayer will pass the first inspection for sprayers in use and that the sprayer is accompanied with a national test report and decal as proof of compliance. It is not a legal requirement.
- The leading European sprayer manufacturers represented in CEMA have a proposal to harmonise such optional individual sprayer proof of compliance by means of mutual recognition of national test reports and decal.
- The manufacturer, as authorised test centre, adopts the suitable test protocol.
- The precondition for the authorisation is a verification and agreement of the manufacturer's test protocol by the authorisation body of a Member State.
- A local authority decal will be applied.
- A CEMA decal supports the mutual recognition between the authorisation bodies.

# Challenges – jobs to do - conclusions

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- CEMA would like to implement a Certificate of Inspection
  - A harmonized certification document / sticker as a type of test report for new sprayers must be developed
  - A mutual recognition document is need – who can do this?
  - National agreements regarding – factory certification are needed
  - How does the farmer / machine owner gets the local certification?
  - How will the sprayer be registered in the different national schemes?
  - The farmer association needs to be involved – approach the end-user needs a machine which is proofed and fulfilling EN ISO 16119 and EN ISO 16122 – this is needed to fulfil cross compliance and different certification schemes - This cost money!
  - How to communicate this to the market?
  - How do we get all Member States involved?
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- **We need SPISE to move forward on these issues!**

# Thank you

**European Agricultural Machinery**  
Diamant Building, Bld A. Reyers 80,  
BE-1030 Brussels  
[www.cema-agri.org](http://www.cema-agri.org)

