



Inspection of New Sprayers before their Delivery

The position CEMA

Christoph Schulze Stentrop

Product manager - HARDI International

Presentation overview

- Who is CEMA
- New sprayer vs. sprayer in use
- CEMA Approach
- Harmonized Procedure
- Mutual Recognition
- 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

- 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 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.

Definitions

▶ In-factory testing

- ▶ Quality, Performance, Compliance related tests, checks and controls conducted during the whole production process (incl. final test) to ensure the requirements given by Machinery Directive (EN ISO 16119)
- ▶ Organized by Quality management & Manufacturing
- ▶ Defined by Production Engineering and Compliance

▶ In-factory inspection

- ▶ Inspection of finalized sprayer according EN ISO116122
- ▶ Certified personal
- ▶ Certified measurement tools
- ▶ Decal is placed on sprayer
- ▶ Test report is accompany the sprayer and copy is filed

New Sprayer – EN ISO 16119

- A new sprayer has to fulfill EN ISO 16119 (2006/42/EC).
- The EN ISO 16119 ensures a higher level of performance than required by EN ISO 16122.
- In-factory tests are already undertaken during the production process.
- The self-certification process including the Declaration of Conformity provided with the machine is not a type approval, but it means that the sprayer delivered complies with the Machinery Directive 2006/42/EC.

Sprayer in Use – EN ISO 16122

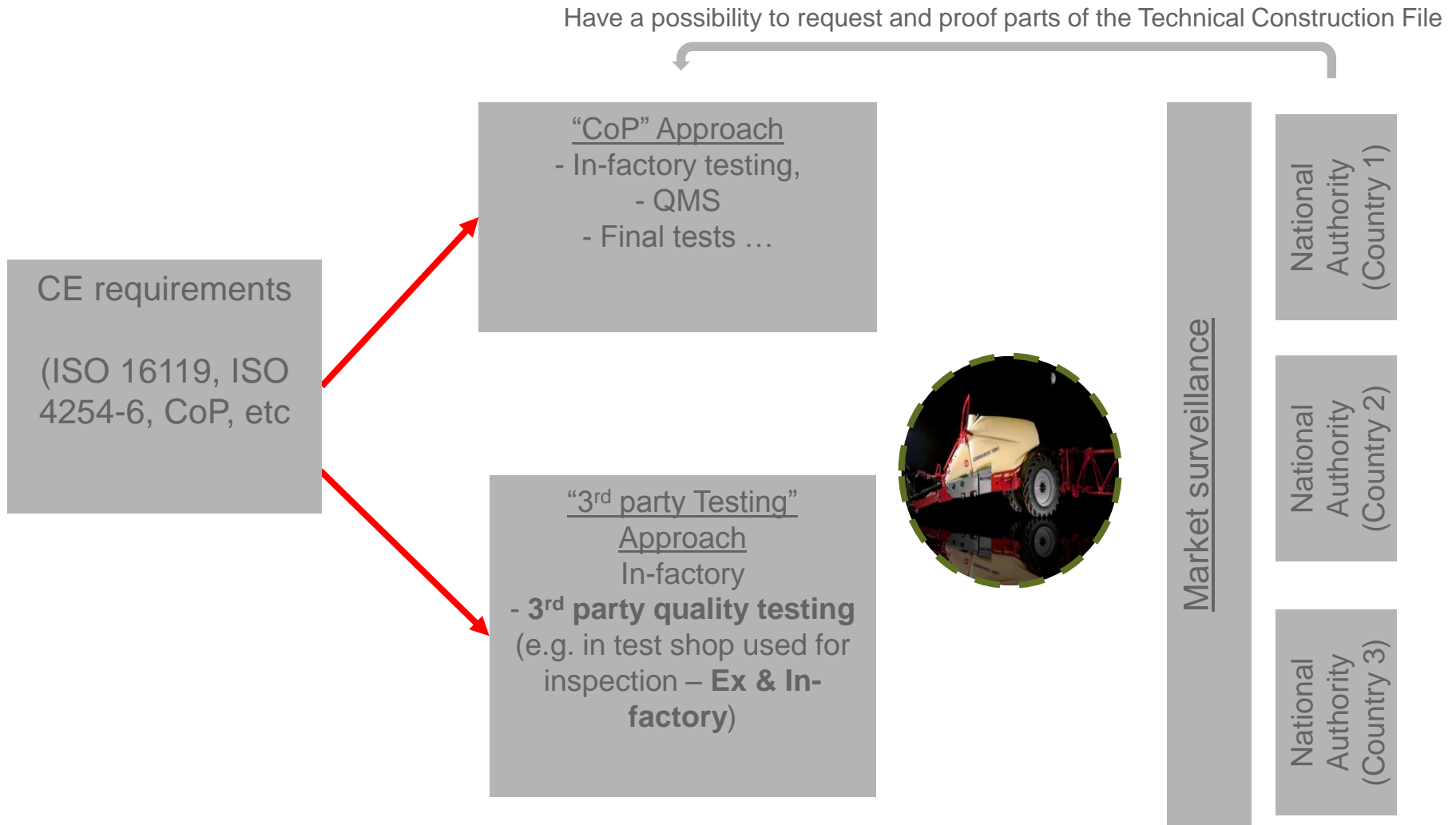
- In-factory inspection is not new – several examples have been present on SPISE workshops in the past
- Some manufacturers have their factory approved by D, NL, ... authorities and do in-factory inspection of sprayers
- Markets as D, NL, UK have a long time experience with the test of new sprayers
- In some countries as Germany was only a reduced test demanded
- Some how is this situation history, as we have now the amendment of the Machinery Directive (MD) and Sustainable Use Directive (SUD) in force
- Today we have far more environmental requirements for new sprayers, which are more demanding than those of the inspection of sprayers in use
- Manufactures did a big effort in self certification

Example of Testing Procedures

Comparison of testing requirements of EN ISO 16122 and requirements for new sprayers to meet EN ISO 16119

Requirements of EN ISO 16122-2	Visual check / Function test	Measurement	Factory Testing to meet CoP (EN ISO 16119)
Static leaks	x		During the tank sensor calibration. During the Pressure regulator set up.
Pump capacity		x	New pump (not wear out) - supplier quality declaration, check quality statistics from supplier. Or internal check with flow meter - selectively every X machine from Y, if internally produced pumps. - Provide information from pump supplier. - Ensure correct pump / machine configuration. (BOM list) Pump capacity on the type plate.
Nozzle spacing/orientation	x	x	Drill fixtures (Quality control), Final test area measurement, visual check, or Patternator test
Pressure drop		x	Per design, - provide Technical Construction File results discuss if measurement is needed.
...

CE – Ensurance of the same Level of Quality



EN ISO 16122 Inspection Scheme – New Sprayer Procedure (CEMA proposal)

- Manufacturers will provide a 'Certificate of Inspection' (Col) identifying the conformity with EN ISO 16122 for the serial number machine with which the Col is being shipped.
- The customer can take this Certificate to the local authority to obtain the appropriate certification label for the purpose of certifying the machine to the appropriate sections of Directive 2009/128/EC. (this will allow to keep the national registers)
- The Technical Construction File (TCF) based on the application of Machinery Directive (2006/42/EC) and the European Directive (2009/127/EC), which is done by the manufacturer during the design and manufacturing process indicates that the sprayer complies with EN ISO 16122

Optional In-factory Inspection

- There is a **certain market demand** for users to have new sprayers certified as complying with the requirements of EN ISO 16122 e.g. to comply with crop assurance schemes or food supply chains.
- Also in the case of “**3rd party testing**” approach for new sprayers, some manufacturers would like to continue to offer “in-factory inspection” to fulfil CE requirements (no decal).
 - In-factory inspection is not applicable at the whole scale of the EU market
 - It would be very difficult for manufacturers, if we have to get approved by all member states. Including documentation of stickers and test certificates
 - Would this be in line with the idea of free trade inside the EU?
 - We need a new approach for a simplified process

Harmonized Procedures

- CEMA would like to have a clearly defined harmonized test procedure across all EU member states - based on the requirements on EN ISO 16119 which also fulfils the EN ISO 16122
- One simple format of the test report which can be mutually recognized by all Member States
- Certificate of Inspection (CoI) would help to get a more harmonized procedure to bring sprayers into different Member states
- Local transfer procedure – registration demands has to be organized
- The different time interval before the first mandatory inspection after the first use is a difficulty
- This time period should comply with the current European legislation (Sustainable use of pesticides (SUD) – 2009/128/EC)

Mutual Recognition

- The harmonization of the testing procedure and intervals are essential prerequisites for the mutual recognition of the test reports and certificates / stickers between Member States.
- Mutual recognition and general harmonization will make the whole testing and inspection framework clearer and more understandable for all stakeholders (authorities, testers, manufacturers, dealers and farmers).
- Acceptance of a certificate/sticker which has been obtained in another Member State than the country where the sprayer is finally used.
- Registration of sprayers are demanded in some countries – here a system must be developed – so the end-user / farmer gets his local approval. Shall be the task for the end-user.

Challenges – jobs to do - conclusions

- 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

