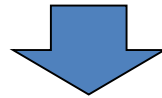


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SUD Possible revision**

What is SPISE WG

**SPISE – *Standardized Procedure for the
Inspection of Sprayers in Europe***



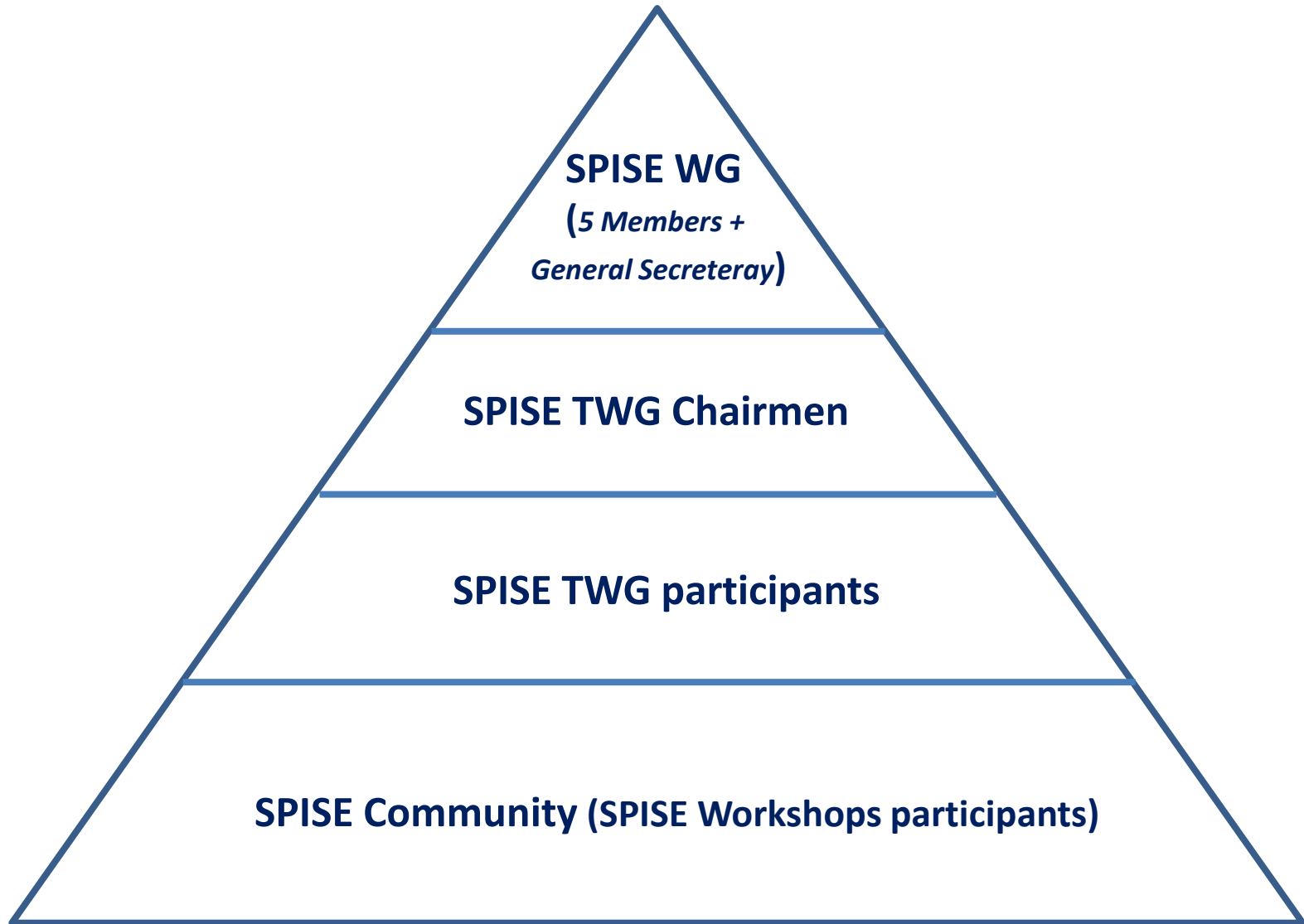
**Voluntary working group (WG) established during the first
SPISE workshop in 2004**



**For the harmonisation and mutual acceptance of the
Inspection of Pesticide Application Equipment (PAE) in use in
EU**

**Constant exchange of information with EC and MS aimed
at improving the sustainability of plant protection product
application.**

HOW IS ORGANIZED SPISE



SPISE main activities

Realize SPISE Workshops where experiences on PAE inspection activities in EU are exchanged

Make survey on Pesticide Application Equipment (PAE) inspection activities in MS

Realize SPISE TWGs Advices

Promote new EN/ISO Standards

Manage SPISE Website

Maintain and improve contacts with EC , MS and Stakeholders involved in PAE Inspection

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The SPISE Position concerning some of the

DG Sante F questions/proposals

- 2) DRONES/AERIAL SPRAYING:

- *Are changes needed to the current SUD regarding facilitating precision agriculture and particularly the use of drones for spraying, change the current SUD wording on aerial spraying?*

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SPISE Position:

- *Specific ISO/EN **standards** methods and requirements **are in progress** (ISO 23177 - part 1.2.3.4) and related to the PPP application components of the Unmanned Aerial System - UAS.*
- *If the use of UAS for applying PPP will be allowed it would then be **needed to develop an additional Harmonized standard on their periodically inspection and the related requirements.***
- *There should be added a note in the future SUD that **UAS are allowed to apply PPP if they meet the requirements of the incoming ISO / EN harmonized standards***

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DG Sante F question/proposal

3) TESTING OF PAE:

- *Any need for changes to the current system for testing PAE outlined in the SUD ?*

3.1 Need for standards and criteria, potentially reduce the testing requirements for basic and less risky PAE, more frequent testing for contractors/large scale users?

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3) TESTING OF PAE:

SPISE Position:

3.1 General

- *The current numbers of inspections of PAE made on average in the EU are **not sufficient**.*
- *The **inspection** service is **not always of the needed and uniform quality**.*
*Several PAE types are not inspected due to the **lack of harmonized Standards**.*

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3) TESTING OF PAE:

SPISE Position:

3.1 General (continue)

To improve this situation the following items should be mentioned in the new SUD:

- Promote the development of a **PAE register in MS;***
- The **CAP subsidiarity system should be linked to the PAE inspection (cross compliance);***
- If the inspection system in a MS is not functioning properly (poor administrative and technical quality of the inspection) , the COM should take over the responsibility;***
- The use of the **SPISE Advices** for the inspection of “minor” PAE **shall be promoted and recommended inside the future SUD ;***
- In order to allow the inspection of all types of PAE **the amendment of Annex II it is needed (see SPISE proposal)***

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3) TESTING OF PAE:

SPISE Position:

3.1 General (continue)

- ***Also the PAE adjustment/calibration at the workshop.(e.g. the fan air speed and direction for orchard sprayers) should be promoted as the verification and official statement of the presence on the PAE of devices able to reduce spray drift and/or point source water contamination. The inspection technicians could carry this out using local regulation or e.g. the drift and point sources management tool developed by TOPPS;***
- ***The COM should promote the development of the still needed EN harmonized standards.***

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3.2 Need for standards and criteria, potentially reduce the testing requirements for basic and less risky PAE, more frequent testing for contractors/large scale users?

SPISE Position:

- ***SPISE sees no need in establishing criteria regarding basic and less risky PAE in terms of reducing the inspection requirements. The present SUD already offers derogations. This is a suitable instrument.***
- ***More frequent inspections for contractors/large scale users is seen as a necessity. The definition for contractors or “large scale” shall be done in the SUD or given by the MS.***

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3.3 Mandatory test before first placing on the market

SPISE Position:

- *The current requirement **to have the first inspection after 5 years is not effective**. Of course not wear and tear can be determined on new PAE but defects caused by the production process or transport occur regularly.*
- *Therefore **the first inspection could be prescribed for a time within 6 months after the purchase date**. (As service many manufacturers already today offer the first inspection when the new PAE is delivered).*

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3.4 Assistance to train testers and facilitate mobile testing services to cover larger geographical areas?

SPISE Position:

- *Assistance for train testers is given by SPISE Advices already.*
- ***Mobile testing services are already in force in several MS. The current harmonized standards gives the possibilities to make on-site inspection.***

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4. POSSIBLE LEGISLATIVE SIMPLIFICATION/REDUCTION OF ADMINISTRATIVE BURDEN: *Can some elements of the SUD be simplified to reduce the admin burden for MS and stakeholders ?*

SPISE Position:

- *There is not need to reduce the testing requirements. **It is already possible** according EN ISO 16122 harmonized standard **to make inspection without the most costly equipment.***

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14. (HARMONISED) RISK INDICATORS: Any suggestions for potential new (harmonised) risk indicators that should be investigated or developed by the Commission, preferably that could be easily and quickly developed ?

SPISE Position:

- *Could the consideration of the **age of a PAE** be an aim for this? It should apply the **younger the PAE the lower the risk.***

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15. COHERENCE/COMPLEMENTARITY OF THE SUD WITH OTHER EU LEGISLATION OR POLICIES: Any areas of contradiction between different EU policies that should be investigated or resolved?

SPISE Position:

- **More connection with the Machinery Directive requirements and more active market surveillance to be sure that brand new PAE comply.**

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Additional comments/suggestion

a) How to manage the PAE disposal at its end life

This is an important environmental aspect (*considering a rough number of PAE in UE of more than 2 Millions and an average life of 20 years that means **100.000 PAE** that every year shall reach their end life*)

SPISE Position

To consider this aspect in the SUD

Article 13: Handling and storage of pesticides and treatment of their packaging and remnants
*Member States shall adopt the necessary measures to ensure that the following operations by professional users and where applicable by distributors do not endanger human health or the environment – **Insert the following sentence : (f) recovery or disposal of PAE componets at its end of life***

And also in Annex 1 :Training : adding a point regarding recovery or disposal of PAE at its end of life

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Additional comments/suggestion

b) Improve the requirements concerning the training of the PAE users

SPISE Position

To modify Annex 1 as follow

8. Procedures for preparing and calibrate the PAE (e.g sprayer filling and empty, nozzles , pressure and forward speed choice, liquid and air flow rate adjustment) in order to prevent ,risks to the user, other humans, non-target animal and plant species, biodiversity and the environment, including water resources.

9. Use of PAE and its maintenance, and of **specific techniques (e.g. closing transfer systems, induction hoppers, drift reduction techniques), as well as the objectives of the technical check of sprayers in use and ways to improve spray quality. **Use and calibration of handheld PAE or knapsack sprayers** and the relevant risk management measures.**

2nd Remote stakeholder event on the evaluation of SUD Possible revision THE SPISE Positions

QUESTIONS ??

*For any additional informations/ request please see the
SPISE web site <https://spise.jiulius-kuehn.de/> and contact
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