



# CEMA views on the SUD Revision

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European agricultural machinery industry

- ▶ 7000 companies mainly **SME's**
- ▶ **Low volumes** of pesticide application equipment: ca. 8500 units annually sold in the EU 27+
- ▶ **High tech solution providers:** for farmers to comply with future stringent sustainability criteria while staying competitive.
- ▶ Very active in
  - ▶ **Standardisation** (technology neutral criteria/requirements for compliance): **CEN & ISO**
  - ▶ **Research** projects e.g. EU funded **INNOSETA** or self-funded **STEP-water**



<http://www.innoseta.eu/nl/home-3/>



Healthy Crops, Clean Water

<https://step-water.org/#/>

<https://cema-agri.org/>

- ▶ CEMA recognizes the need to improve current plant protection products (PPP) application situation in the EU and world-wide.
- ▶ CEMA supports the EU Farm-to-Fork strategy and is ready to contribute to meet its goals set for 2030.
- ▶ The use of PPPs can be reduced significantly; however, we do not foresee that chemical application can be fully replaced by non-chemical way of plant protection. This principle is already specified by the Integrated Pest Management - we support this approach!
- ▶ CEMA members constantly develop new application technologies which will allow to reduce the total amount applied PPPs and their losses by maintaining the biological efficiency and low food production costs for the EU farmers and consumers.

- ▶ CEMA is ready to participate on the revision of SUD which will reflect the technology state-of-the-art, anticipate future technology developments and will serve to all stakeholders for the coming **decades**.
- ▶ **Allow long term planning** - Farmers and AT manufacturers must get legal certainty in support of a good investment climate.
- ▶ The SUD directive shall not be in a conflict with other EU directives (e.g. Machinery Directive) and shall not pose additional barriers for new technologies which could block or slow down their entry to the EU market.
- ▶ Develop or revise current EU legislation which will promote and classify the technologies for Variable Rate and Site-specific application.

# Proposals for SUD Revision

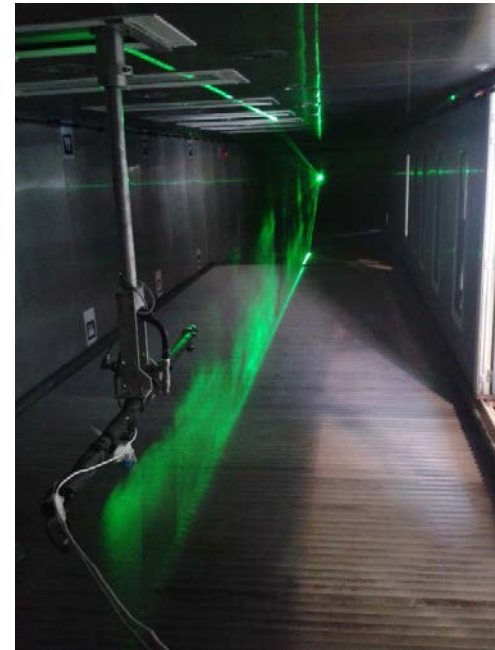


- 1. *Harmonization of the certification process for Drift Reduction Technologies (DRT).***
- 2. *Introduce a new harmonized classification for variable rate and site-specific application technologies.***
- 3. *Open the SUD for new technologies.***
- 4. *Adjust the period for the first inspection of sprayers in use.***

# 1. Harmonized Certification of DRT

## ISSUE:

- ▶ Non-harmonized certification framework for Drift Reduction Technologies (DRT) across Europe
  - Non-harmonized DR classes
  - Not-harmonized “Reference Spraying Device”
  - Non-harmonized Test methodology
  
- ▶ Mutual recognition of test reports between national authorities is very limited which causes:
  - ▶ **Delay of introduction of new technologies to the EU market**
  - ▶ **High costs for testing = Higher costs for EU farmers**



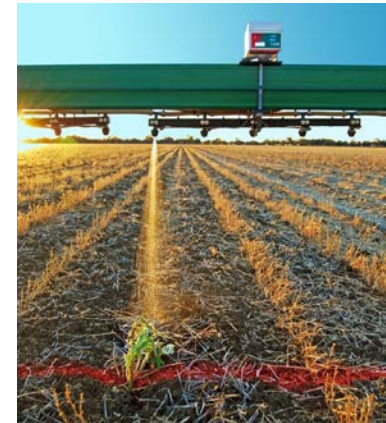
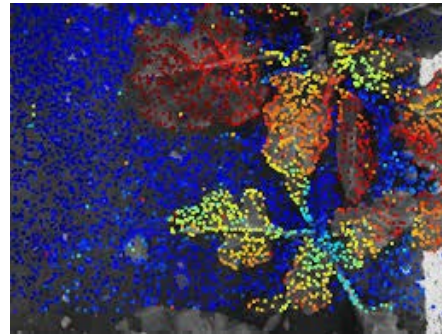
## SOLUTION:

- ▶ We ask the EU Commission to support further development of the DRT test scheme at the EU level which is necessary for improvement and harmonization.
  
- ▶ Legislative changes of SUD Directive – “Move the agenda from National legislation to the EU level”
  - ▶ Allow harmonization of DRT classification and EU certification scheme

## 2. Harmonized Classification of VRA and Site-Specific Application Technologies

### ISSUE:

- ▶ **Site-specific application technologies & Variable rate technologies** with (e.g. individual nozzle control) are not properly weighted against traditional sprayers.
- ▶ The use of these technologies will **unlock the further reduction potential for PPPs** (up to 60% / ha).



### SOLUTION:

- ▶ Develop a new EU-harmonized classification scheme for VRA and Site-Specific Technologies similar as for Spray Drift classification it and anchor it into SUD directive by reference to a harmonized CEN standards.
- ▶ It will help to promote and regulate the usage of these new technologies and harmonize the conditions of use across the EU.

### 3. Open the SUD for New Technologies

**ISSUE:** New technologies shall not be hindered by legislation.

*Example:*

- ▶ Currently there is no differentiation between traditional aerial spraying and spot application by UAVs.
- ▶ There remains an unused potential of UAV sprayers for use in steep wine yards, or for weed monitoring and immediate spot-application at low altitudes in crop fields.



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**SOLUTION:**

- ▶ The SUD in combination with harmonized CEN standards shall define the conditions for use.



# 4. Adjustment of the Period for First Inspection of Sprayers in Use



## ISSUE:

- ▶ Current SUD wording (Article 8. Par. 2) which defines the first date for sprayer inspection aligns with the principles of the Machinery Directive.
- ▶ All CE certified application technology shall be allowed to be placed on the EU market and put into service **without any national restrictions.**

## SOLUTION:

- ▶ The first inspection shall be conducted three years after putting the sprayer into service.





# Thank you!

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