



CEMA - Revision of SUD Directive

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- ▶ CEMA recognizes the need to improve current plant protection products (PPP) application situation in the EU and world-wide and supports the EU Farm-to-Fork strategy.
- ▶ CEMA expect that the revision of SUD will reflect the technology state-of-the-art, anticipate future technology developments and will serve to all stakeholders for more then two next decades.
- ▶ The SUD directive shall not be in a conflict with other EU directives (e.g. Machinery Directive) – self-certification principle must be ensured. SUD shall not pose additional barriers for new technologies which block or slow their entry to the EU market.
- ▶ Develop or revise current EU legislation which will reduce administrative burden for authorities and PAE manufacturers by **harmonization of the certification schemes** (incl. test methods and classification of PAE).

COMM Proposal:

- ▶ *Within certain parameters, to be defined in a future legislative Annex, no derogation would be required for aerial spraying by drones if demonstrated to reduce overall use and risk...*
- ▶ *Allow spraying (including aerial spraying) without prohibition and without derogation if the spraying instrument is less than 2 metres from the crop being sprayed, other parameters concerning use and risk would need to be studied and established...*

CEMA:

- ▶ CEMA welcomes the legislative proposals which open the possibilities for new technologies.
- ▶ PAE industry works together with other CEN stakeholders (universities and state research institutes) on new standards which will define the conditions of use, e.g. to cover spray drift risk.

Integrated Pest Management (IPM)



COMM Proposal:

- ▶ *Specific record-keeping by professional pesticide users as a tool to monitor and enforce IPM implementation...*

CEMA:

- ▶ PAE industry participates in couple of projects aimed to establish a **digital network between relevant databases** e.g.: *product label, regulatory limits for use, PAE classification (incl. Drift), machine settings, GIS and farm/field data*, which allow the traceability of the PPP use and will help to farmers to document and report out about their application job.
- ▶ A new standard (ISO 4444) is being developed for Recording of Spray Drift Relevant Parameters

Pesticide Application Equipment (PAE)



COMM Proposal:

- ▶ *Commission support for further development and application of harmonised PAE testing standards...*

CEMA:

- ▶ A clarification of this proposal is needed.
- ▶ Key target shall be prioritizing development and application of harmonized test method(s) for performance testing and certification schemes (especially for DRT) of **new** Field crop and Orchard sprayers, accompanied by standards for inspection of Sprayers **in use**, uniformly across the EU.
- ▶ SUD shall allow the harmonization of the DRT certification across EU
 - ▶ Certification schemes are currently under NAPs -> Must become a part of EU directive (SUD).
 - ▶ Lower administration burden for MS: one test, one certificate & **mutual recognition**
 - ▶ Easier understanding of the classification scheme for user and control authorities
 - ▶ Prerequisite for digitalization – traceability / recording of sprays

Pesticide Application Equipment (PAE)



COMM Proposal:

- ▶ *Require new PAE to be tested before being put into use to avoid the risk that potential defects could go undetected until first tested years later...*

CEMA:

- ▶ All **CE certified** PAEs are constructed and **tested** as part of quality assurance in production at factories to meet EN ISO 16119 standard and MD requirements.
- ▶ EN ISO 16119 (Environmental Requirements for Sprayers) sets **higher performance requirements on PAEs** than EN ISO 16122 (Inspection of Sprayers in Use).

The first inspection of new sprayers according EN ISO 16122 before being put into use is therefore not appropriate due to the infringement of Machinery Directive principles.

Please also note:

- ▶ Defects are picked up by quality assurance in production
- ▶ OEMs and their dealers provides secure delivery and additional checks of PAEs before they are handed over to end-users
- ▶ Limited capacity of current inspection labs. Some MS are not able to finish the inspection of current field population (20-30 years old PAEs)



Thank you!

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