Implementation of SUD in the Czech Republic – right or wrong way for inspection of pesticide application equipment?

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Summary
On the November 29th 2009 was issued new Directive no. 128/2009/EC by the European Commission. This Directive establishes rules for carrying out regular inspection of pesticide application equipment (PAE) in use. Article no. 8 of the directive states that the interval between inspections shall not exceed five years until 2020 and shall not exceed three years thereafter.

The inspection system was established in 1997 as obligatory in the Czech Republic. The system was built into a functional and efficient during this time and can be compared with systems in other EU member states. The inspection interval is three years for included groups of PAE and meets the current requirements for inspection now.

Introduction
By 14th December 2016, Member States shall ensure that pesticide application equipment has been inspected at least once. After this date only pesticide application equipment having successfully passed inspection shall be in professional use.

New PAE shall be inspected at least once within a period of five years after purchase.

Some experts from several NGOs in CZ are of the opinion that it is necessary to satisfy the farmers and enable them to be able to get the PAE in use to inspection at intervals corresponding with the directive – it means 5 years!? This will have negative effects for the network of approved inspection sites – reduce the number of inspections, reduced the number of stations, lower availability for farmers. The most significant impact of this change may have on the quality of PPP application which is inconsistent with the requirements for environmental protection.

Situation in 2011
Inspection is in good conditions, workshops carried out inspections and was prepared on-line database for evidence of inspected PAE. The interval was three years for every groups of PAE which were a subject of inspection (field sprayers, orchard sprayers, seed treatment machines, aerial application equipment and equipment for railway).

There have been reported further efforts from NGOs to extend the interval of inspection to five years for every groups of PAE.

Situation in 2012 and for the future
There was issued a new amendment 384/2011 Coll. which changed the inspection interval to five years! New (next amendment) is under preparation and wait for approved by the government. No certification system designed the verification of inspection will be establish.

Conclusions
- negative effects for the network of approved sites
- reduce a number of inspections,
- reduce number of sites,
- lower availability for farmers.
- the most significant impact of this change is expected on the quality of PPP application which is consistent with the requirements for environmental protection.
- the introduction of the longest interval of the inspection will have a negative impact on possibility of mutual recognition of inspections.