Inspection of individual sprayers - recommendation Paper

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CEMA, representing the agricultural machinery industry has always been in favour of more harmonization. The introduction of environmental requirements for sprayers in the Machinery Directive 2006/42/EC is a great example of such harmonization. Persuasion was however necessary to make sure that self-certification was seen as the right conformity assessment procedure and that standards were seen as the right tools to work out the detailed technical requirements and tests according to the state of the art. The procedure of self-certification for machine safety and the innovative freedom it provides to manufacturers makes that Europe has some of the most advanced technologies in the world. Standards as EN 12761, ISO 4254-6 and EN 13790, that are or will be harmonized under the Machinery Directive will support manufacturers to keep providing such uniform high quality in Europe. It should be avoided that these harmonised standards have contradictory requirements. In reviews the content of all involved standards should be compared.

Due to the amended Machinery Directive a European customer is ensured that his sprayer meets the essential safety & health and environmental requirements. And with unification of machine standards and in-use inspection standards like EN 13790 he will know that his product will comply with the in-use inspection. Any equipment manufacturer has testing procedures. CEMA recommends that manufacturers make a sprayer quality test procedure according to EN 13790 as part of their quality check. However it is absolutely necessary that if manufacturers follow a national test procedure based on EN 13790 in a certain member state, the results are recognized in the other member states. And having an easier approval procedure could encourage companies to train own staff in the different countries. CEMA also recommends that in the further developments of EN13790 national variations are reduced so that only one uniform standard remains.

Such unification in legislation/standardisation should also follow for environmental requirements as now imposed by different national authorities on e.g. cleaning of machines, determination of drift, how to handle rest residues... With uniform requirements over all Europe, it will be easier and more profitable for manufacturers to develop the necessary intelligent solutions.

CEMA is pleased that a mandatory European inspection of sprayers in use has been agreed upon, as it will contribute to the continuity of the high performance levels of individual machines. Though only 5 years has been set as a first minimum time period between inspections, a more stringent and uniform time period for all Europe would be recommendable in the future.

The need for harmonized European inspection of sprayers from the manufacturer's view

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Product group sprayers

SPISE workshop

- Increasing quality level in crop protection
- Public attitude towards chemical usage
- Environmental awareness

- Product development, considering all legal and customer demands
  - All aspects of use
  - Safety, environmental and operator
  - Cost effectiveness

Product group sprayers

SPISE workshop

- Quality of design
- Quality of production
- Quality of maintenance

- Different member states
- Different regulations
- Different procedures

- Need for harmonization
- Both for new and used sprayers
- Tested in one member state, free to use in other member state
- Cost saving administrative procedures

Product group sprayers

SPISE workshop

- Adding environmental aspects into the Machine Directive could cover all new sprayers
- Harmonized procedure for used sprayers
- Harmonized certification of sprayer test stations
- Investments in product development require European market volume
- Avoiding costs caused by national regulations and procedures
- Increasing quality level of sprayers on the market
- Improved application of agrochemicals
- Improved acceptance by the public