

CERTIFICATION OF SPRAYERS WITHIN THE PROPOSED EC THEMATIC STRATEGY: SOME CONCERNS

The UK Pesticides Forum was set up by Ministers in 1996 to bring together organisations having an interest in the use of pesticides and their impact on the environment. Its primary purpose is to support and promote measures aimed at minimising the use of pesticides and their adverse impacts on the environment. The Forum has recently been providing advice to the UK Government on its proposals for a national strategy on pesticides and has recently been alerted to the Commission's proposals for a Thematic Strategy on pesticides.

The Forum has noted that the proposed Thematic Strategy includes proposals for technical checks on sprayers, including the following two possible components:

- a) certification of sprayers before they are placed on the market to ensure they meet 'necessary criteria' for human and environmental safety; and
- b) inspection of sprayers in use to ensure that they are well maintained.

Both of these would be underpinned by existing European standards - (a) by EN 907, 'Sprayers and liquid fertilizer distributors – Safety' (already mandatory throughout the EU), and EN 12761 'Sprayers and liquid fertilizer distributors – Environmental Protection', and (b) by EN 13790 'Sprayers – Inspection of Sprayers in use'.

With respect to inspection of sprayers in use, 17 out of 25 Member States have systems in place for this, which all comply with most of the requirements of EN 13790. These systems have proved of considerable benefit in ensuring sprayers are well maintained. The UK currently has a voluntary system for inspection of sprayers in use. This is the National Sprayer Testing Scheme (NSTS), which was initially set up by the Agricultural Engineers Association (AEA) in 1999. The NSTS complies with the requirements of EN 13790, which currently allows on-farm testing.

However, with respect to certification of sprayers, currently only 2 out of 25 Member States have certification systems (Germany and Poland), and the 'necessary criteria' for human and environmental safety are not totally agreed. EN 907 has proved problematic in the UK due to unclear wording. This has led, for example, to the UK Health and Safety Executive imposing a restriction on boom folding height. EN 907 is currently under revision with ISO (with no agreement at present after 4 years of the revision process).

EN 12761 is not mandatory in the UK but if imposed by the Thematic Strategy it would ban or restrict various innovative application techniques and equipment already in use in the UK (e.g. angling of nozzles, rotary and twin fluid atomisers etc) which have demonstrated environmental benefit compared with traditional spray equipment that does conform with EN 12761.

This is because EN 12761 sets specific requirements for spray distribution (measured on a laboratory patternator) and droplet size based on the performance requirements of one particular nozzle type, the flat fan hydraulic pressure nozzle. Other nozzle types, or nozzle configurations, do not necessarily meet the spray distribution

criterion despite having shown environmental benefits compared to flat fan hydraulic pressure nozzles (which have been shown, in certain circumstances, to result in losses to the environment of over 90% of the spray emitted – despite complying with EN 12761). The droplet size requirement would essentially eliminate use of ‘fine’ sprays due to their drift potential. However, there are existing UK agrochemical clearances for ‘fine’ sprays, and smaller spray droplets, although potentially increasing the risk of spray drift, have been shown to be more effective against certain target pests, allowing potential reductions in the overall use of agrochemicals (although operators must be aware of the risks of using fine sprays and exercise care). The great danger is that these rigid requirements of EN 12761 would inhibit innovations that could minimise the use of pesticides and/or adverse impacts on the environment.

The UK British Standards Institute offered scientific arguments against these arbitrary requirements during the drafting of EN 12761 but these were ignored. Concerns about the imposition of EN 12761 in the proposed EC Thematic Strategy have been raised with the EC by individual UK sprayer manufacturers and industry associations such as the Agricultural Engineers Association, the Agricultural Industries Confederation, the British Crop Production Council and Pesticides Action Network-Europe.

Recommendation

The UK Pesticides Forum would like to recommend that the proposed EC Thematic Strategy on the Sustainable Use of Pesticides does not at this stage include mandatory certification of sprayers based on the requirements of the current EN 12761 since this would inhibit application techniques and equipment designed to minimise the use of pesticides and/or adverse impacts on the environment.

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