

A.E.A.

Samuelson House
Paxton Road
Orton Centre
Peterborough PE2 5LT

Director General
J. VOWLES

SERVING THE AMENITY, ENVIRONMENTAL AND AGRICULTURAL INDUSTRIES

19 July 2004

Mr E Liegeois
European Commission
DG ENV
Unit B.4
Rue de la Loi, 200 (Office BU 5 – 2/158)
1049 Brussels
Belgium

Dear Mr Liegeois,

Re: EU Thematic Strategy on the Sustainable Use of Pesticides

The UK Agricultural Engineers' Association (AEA) represents manufacturers and importers of agricultural equipment, including equipment for the application of pesticides.

We are therefore particularly interested in the proposed technical checks on sprayers, and our Chemical Application Committee (CAC) discussed this matter at our last meeting.

We understand that the EU is considering introducing European wide inspection of sprayers in use, based on EN 13790. Please note that AEA CAC was responsible for developing a testing procedure for UK inspection of sprayers in use (prior to the development of EN 13790), which has since become the National Sprayers Test Scheme (NSTS). This is currently a voluntary scheme, but is being promoted by the UK Voluntary Initiative and various farm assurance schemes. We were involved via the UK British Standards Institute in the formulation of EN 13790, and have attempted to ensure the procedures in NSTS comply with EN 13790. We therefore support this proposed technical check on sprayers – which should be allied with operator training that includes calibration and ongoing maintenance procedures (as successfully done in the UK). We would point out that AEA fought strongly to ensure checking of nozzle flow rates could be used as well as a patternation option within EN13790 since use of patternation would severely reduce the possibility of doing on-farm testing with the larger sprayers that are increasingly used in the UK. Having to transport sprayers to a test centre would dramatically increase the cost of sprayer testing in many

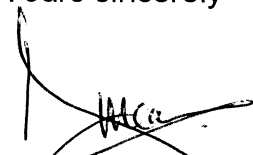
All Terrain Vehicles
Balers & Wrappers
Broadcasters & Spreaders
Chainsaws
Chippers & Shredders
Cultivation
Driers
Drills & Planters
Engines
Fencing
Forestry
Fork Lifts
Garden Equipment
Golf Courses & Parks
Hedge Maintenance
Horticulture
Irrigation
Lawn & Garden
Livestock
Mowers
Ploughs
Pumps
Root Crops
Silage
Slurry
Sprayers
Stone Separators
Storage
Sugar Beet
Sweepers
Tractors
Trailers
Trimmers
Turf Maintenance
Vacuums
Vegetables
Washers
Waste Water

areas in the UK due to the distances involved and carries environmental risks e.g. leaking sprayers or dripping nozzles on roads next to ditches, etc.

We understand that certification of sprayers before they are placed on the market is also under consideration, based on EN 12761. Whilst we do not disagree in principle with such certification any such scheme must be Europe wide and based on the same criteria otherwise it will act as a restraint to trade. However, we do have concerns about the specific requirements in EN 12761 regarding distribution measurement by patternation and droplet sizes since these are based on one technique and nozzle type and therefore discriminate against other techniques and nozzle types which have been shown to have the potential to better target sprays and reduce environmental impact in certain circumstances e.g. angling of sprays, use of fine sprays, variable rate application across a boom, twin fluid nozzles, rotary atomisers, etc. AEA helped develop a UK position paper on the dangers of reliance on patternation measurements that the British Standards Institute submitted to CEN in early 1998 and we will gladly send you a copy of this if you wish. It should also be noted that there are existing UK agrochemical clearances (that have been assessed for product safety and efficacy) that would not be allowed under the terms of EN12761.

Finally, we understand that in some EU countries use of dosages lower than specified on the label is not possible. We believe that this is entirely contrary to the aims of the Thematic Strategy and trust that the EU will address this issue to ensure encouragement of IPM/ICM and low input farming.

Yours sincerely



Duncan Russell

Secretary to Chemical Applications Committee.