



# CEMA - Revision of SUD Directive

Dr. Peter Hloben  
Chairman of Crop Protection team, CEMA  
25. June 2021, 2<sup>nd</sup> Remote Stakeholder Event

- ▶ 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!

**CEMA Secretariat**

T +32 (0)2 706 82 27

[secretariat@cema-agri.org](mailto:secretariat@cema-agri.org)

Boulevard A. Reyers 80

B-1030 Brussels

[www.cema-agri.org](http://www.cema-agri.org)

