SPISE POSITION ON SOME QUESTIONS RELATED TO THE DOCUMENT ON

Possible future SUD[1] policy options for feedback from Advisory Group on the Food Chain and Animal and Plant Health members[2]

ANNEX A

SPISE draft proposal for the amendment of the Annex II.

ANNEX II

Health and safety and environmental requirements relating to the inspection of pesticide application equipment. The inspection of pesticide application equipment shall cover all aspects important to achieve a high level of safety and protection of human health and the environment. Full effectiveness of the application operation should be ensured by proper performance of devices and functions of the equipment to guarantee the following objectives are met.

The pesticide application equipment must function reliably and be used properly for its intended purpose ensuring that pesticides can be accurately dosed and distributed. The equipment must be in such a condition as to be filled and emptied safely, easily and completely and prevent leakage of pesticides. It must permit easy and thorough cleaning. It must also ensure safe operations, and be controlled and capable of being immediately stopped from the operator's seat. Where necessary, adjustments must be simple, accurate and capable of being reproduced.

All equipment necessary for an inspection and used by the inspector for testing the pesticide application equipment shall be accurate, in good condition and checked at regular intervals.

Inspections shall be made at a location which avoids risks of pollution and water contamination. The influence of external conditions on the reproducibility of the results of the inspection shall be minimized (e.g. effects of wind, rain).

Inspection shall pay special attention:

1. Safety

The equipment shall be clean and safe before the inspection starts. Special attention shall be paid to the power take off driveshaft guard, the protective devices for the power take off and other rotating power transmission parts, leakage from the hydraulic system, condition of hydraulic hoses and pipes, safety of electrical parts, functioning of safety valves, condition of structural parts and framework, locking of foldable parts and the guarding and condition of the blower (in case of an equipment with air-assistance)

2. Leakage

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Both in stationary and working conditions there shall be no leakage or dripping from any part of the equipment. There shall be no dripping or unintended spreading after the equipment has been switched off. For equipment to apply liquid products there shall be no leakages from pipes or hoses when run with the maximum obtainable pressure for the system and no liquid shall be sprayed directly on to the sprayer itself.

3. Pump(for equipment to apply liquid products)

The pump capacity shall be suited to the needs of the equipment and the pump must function properly in order to ensure a stable and reliable application rate.

4. Agitation/mixing (for equipment to apply liquid products)

Agitation devices must ensure a proper recirculation in order to achieve an even concentration of the whole volume of the liquid spray mixture in the tank.

5. Spray liquid tank/hopper

Spray tanks and hoppers including filling level indicators, filling devices, strainers and filters, emptying and rinsing systems and mixing devices shall operate in such a way as to minimize accidental spillage, uneven concentration distribution, operator exposure and residual content.

6. Measuring systems, control and regulation systems

All devices for measuring, switching on and off and adjusting pressure and/or flow rate shall be properly calibrated and work correctly. The controls to be operated during the application operation shall be operable from the operator`s position, the necessary instruments to control the operation shall be present and accurate and the instrument displays shall be readable from the operators position. For equipment to apply liquid products, pressure adjustment devices shall maintain a constant working pressure at constant revolutions of the pump, in order to ensure that a stable volume application rate is applied. Additional equipment to dose/inject pesticides shall function accurate and correctly.

7. Pipes and hoses

Pipes and hoses shall be in proper condition to avoid disturbance of product flow or accidental spillage in case of failure.

8. Filtering (for equipment to apply liquid products)

In order to avoid turbulence and heterogeneity in spray patterns, filters shall be present and in good condition and the mesh size of the filters shall correspond to the size of nozzles fitted on the sprayer. Where applicable the filter blockage indication system shall operate correctly.

9. Spray boom (for equipment applying pesticides by means of a horizontally positioned boom, located close to the crop or the material to be treated).

The boom must be in good condition and stable in all directions. The fixation and adjustment systems and the devices for damping unintended movements and slope compensation must work correctly.

10. Nozzles/outlets (for equipment to distribute liquid products)/ Outlets (for solid products)

Nozzles/outlets must work properly.. The flow rate of each individual nozzle/outlet shall not deviate significantly from the data of the flow rate tables provided by the manufacturer.

11. Distribution

Where relevant, the longitudinal, transversal and vertical (in case of applications in vertical crops) distribution of the product in the target area must be even.

12. Blower (for equipment distributing pesticides by air assistance)

The blower must be in good condition and must ensure a stable and reliable air stream.

13. Cleaning

If provided, tank cleaning devices, devices for external cleaning, devices for cleaning of induction hoppers and devices for the internal cleaning of the complete PAE, shall function.