

The CEMA decal - promotion of the inspection of brand new sprayers

Christoph Schulze Stentrop

(HARDI International A/S)
CEMA PT 24 working group

Summary

The placing of pesticide application equipment (PAE) on the market in compliance with the European legislation and the in-use inspection are both covered by this CEMA initiative.

The declaration of conformity is part of the sprayer operator handbook and demands a risk assessment of the manufacturer. On top of this some customers, dealers and importers want to be double sure that the new sprayer will pass the first inspection for sprayers in use and that the sprayer is accompanied.

In combination with a national test report and the CEMA decal a further proof of compliance is given, but it has to be stated that this is not a legal requirement.

The leading European sprayer manufacturers represented in CEMA have started to harmonise such optional individual sprayer proof of compliance by means of mutual recognition of national test reports and the belonging decal. To use the CEMA decal the sprayer manufacturer needs to be an authorised test centre, while the suitable test protocol could be adapted to a certain demand. An important precondition for the authorisation is a verification and agreement of the manufacturer's test protocol by the authorisation body of a Member State.

The presentation will promote the use of this preliminary inspection. A report will be given, to show the status after the launch on the Agritechnica 2017.

The CEMA decal supports the approach of the manufacturers to bring new PAE to a higher safety and quality level. A positive effect is also that the training and the certification of the test staff is easier, as only one national certificate is demanded. The CEMA decal will support the mutual recognition between the authorisation bodies.

Keyword: preliminary inspection, new sprayers, CEMA decal

Situation:

The leading European sprayer manufacturers represented by CEMA have always worked along a clear vision and strategy to ensure the safety and health of the operator and the protection of the environment, while satisfying the customer demands for functionality, versatility, operability, etc. Therefore, in addition to the efforts in product development the industry, together with the other stakeholders, has drafted the harmonised European standard EN ISO 16119 for placing sprayers on the EU market and as second step the harmonised European standard EN ISO 16122 for inspection of sprayers in use. Standardising the requirements and methods for inspection of sprayers in use takes into consideration not only the original performance of the sprayer but also its use, care and maintenance. This is a logical link to ensure the continued benefit arising from the supply of new sprayers of good quality and with all officially demanded features.

What are the current steps in the process of approval and in-use inspection today?

The self-certification (module A) according to the Machinery Directive, which is usually based on the EN ISO 16119, is an obligation for the manufacturer. It is part of the declaration of conformity and it is identifiable on the machine by the CE mark.

The Declaration of Conformity is the formal and legal statement addressed to authorities that the individual machine complies with the Machinery Directive under self-certification.

The inspection of sprayers in use according to EN ISO 16122 (formerly EN 13790) must be carried out by an authorized test centre. The first inspection must take place not later than 3 / 5 years after placing on the market.

Problem:

Compliance for new sprayers with EN ISO 16119 includes higher performance requirements than EN ISO 16122, but customers, dealers and importers want to be double sure that the new sprayer will pass the first inspection for sprayers in use. Therefore they prefer that the new sprayer will be delivered with the certificate showing compliance with the national demanded test level, which can be on different levels either following the EN directive 128 (Sustainable Use Directive) or EN ISO 16122 or EN 13790. This includes for the customer a national test report and decal.

The first inspection, according EN ISO 16122 or EN 13790, of the sprayer can be offered by the manufacturer as an additional service, i.e. in terms of an optional item in the product catalogue (as already done today in various Member States), but there is no mutual recognition of national test reports across all member states, due to different reasons. Already the link to the EU directive 128 (Sustainable Use Directive) where the sprayer in use inspection is based on is interpreted differently by the different Member States.

Individual sprayer inspections for each Member State would be the worst case scenario, difficult or impossible to be managed and therefore it would be rejected by the industry.

Solution:

The (first) inspection is offered by the manufacturer as an option – it is not an obligation. It is up to each individual customer to decide whether or not he likes to accept and to buy this offer as option.

Upon a request, the manufacturer shall be approved as an authorized test centre by an authorization body of one Member State, in order to carry out officially recognized sprayer inspections.

The test reports and certificates issued by any authorized test centre (including an authorized manufacturer) shall be mutually recognized. This mutual recognition is a mandatory requirement according to the Sustainable Use of Pesticides Directive!

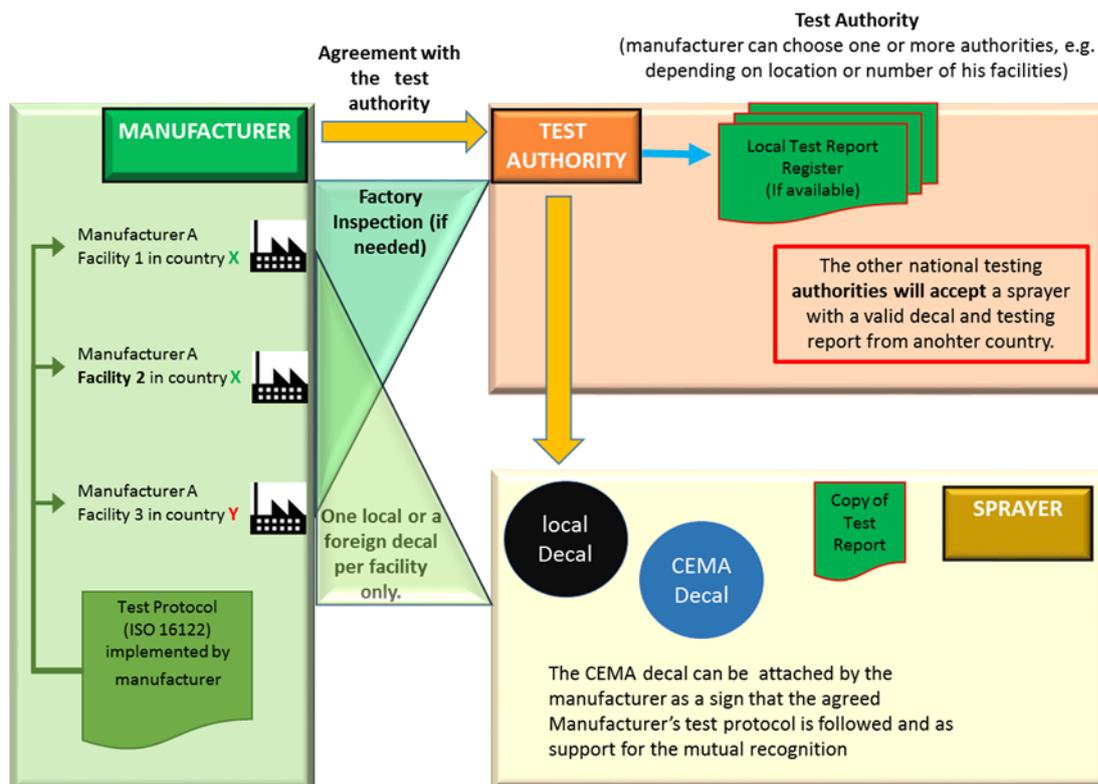


Figure 1

CEMA Approach in detail:

There is a test protocol based on the EN ISO 16122 adopted by a manufacturer. The test protocol can be specifically written for the manufacturing facility (tailored to the manufacturer depending on the level of integration of the Certificate of Production into his manufacturing processes). It is referred to as the manufacturer's test protocol.

The manufacturer can choose for its authorisation as test centre an authorisation body which is located at the manufacturer's facility place (county, province or state), or it can be an authority from one of the different EU member states.

The selected authority is asked to verify whether the Manufacturer's test protocol is fulfilling the requirements of EN ISO 16122 and whether it can be agreed, with or without certain modifications, as equivalent of the test protocol from the testing authority. The authorisation as test centre is dependent on this agreement.

The selected authority may visit and inspect the manufacturing facility (to check items related to EN ISO 16122 only).

The manufacturer will conduct the testing of the sprayer according the test protocol and will be authorized to issue the testing report and place the local authority decal on the machine.

The manufacturer will pay fees related to the approval as test centre.

The different national schemes (authority, testing records and decals) will be kept as they are today.

The CEMA decal can be attached by the manufacturer as a sign that above procedures are followed and as support for the mutual recognition. A solution for national test reports and decals could then still be done locally following the local procedure or registration process, but a new test should not be done to get this national documents! Here it is a great help to have a national responsible contact to get this process better organised.



Figure 2

Status

The CEMA decal has been officially launched at the Agritechnica 2017. The leading manufacturers had the decal on their inspected sprayers and showed the concept to farmers and dealers.

Today the European market in regards of sprayer testing is not homogeneous. The countries, where it has been common practice to deliver sprayers already inspected has the same situation as before, the only difference is another extra decal. But these established markets still demand to keep the same performance level, including changes in digital reporting etc.

Other areas where the inspection has no tradition are still struggling to do introduce both, an inspected sprayer and an extra decal. It should be noted that the 5 years first inspection is seen as a drawback, as an inspected sprayer has to come to next inspection after 3 years. But this will change in 2019 when the first inspection has to be after 3 years.

Also a problem is that not all national regulations allow an inspection in the factories, which forces some extra work and ideas to solve this.

Another issue is that national inspections have different price levels, which always leads to discussions in a price sensitive industry as the sprayer business is. The whole process cost money and the advantages of mutual recognition are not really seen by production responsible persons in the different companies.

Further information:

<http://www.cema-agri.org/cema-inspected>