



**Pesticide
Action
Network**
Europe

PAN-Europe position paper on Commission proposal for a Directive on machinery for pesticide application (2008/0172-COD)

PAN-Europe welcomes Commission proposal to amend Directive 2006/42/EC and to include environmental protection requirements for pesticide application machinery. This European Directive is also useful for setting minimum mandatory levels of performance for this kind of equipment. Fully automatic machinery is advisable and handheld spraying equipment and “knapsack” to be phased out.

We propose to put environment in the text of the Directive at the same level as health and safety of person and not (as in Art. 2,4 and 9) only “where appropriate”. Pesticides are released on purpose in the environment, so environment is always at stake. Additionally to that the articles in the Directive (like 2 and 4) should be based on the precautionary principle and we propose to add this in at least Art. 2.m and art. 4.1. Precautionary principle means that in case any doubt might arise for a given action, the precautionary approach demands the use of the safest alternative (like no spraying) to prevent environmental damage.

PAN-Europe aims at banning the most hazardous pesticides and at reducing the use of the other synthetic chemicals. Synthetic chemicals should only be used as a last resort as no other means of crop protection are available. If spraying is necessary, pollution of the environment should be prevented. In case of spraying we see the hardware (machinery) and the software (management by the farmer or other applicant) as two sides of the same coin. For both coin-sides we need strict and mandatory provisions to prevent pollution of the environment. For three main areas we see a need to act and include provisions in this Directive or in the Framework Directive on the sustainable use of pesticides.

1. Ensure that pesticides don't pollute non-target areas (soil and water). We think a clear quantitative standard is necessary to make enforcement of this principle possible and propose to take **detection level of pesticides as the standard to be applied at two meters from the crop edge** (this two meters is the spray-free zone of the field). Provisions necessary to prevent exceeding this standard (and to be included in this Directive) are:
 - Nozzles ensuring a droplet size $> 150 \mu\text{M}$ to prevent spray drift
 - Low boom height as possible, not exceeding 40 cm above crop
 - Application of air-supported sprayers to “push” the pesticides on target
 - Ensure precision-spraying in the row.

- Shielding of the spraying equipment in case of open-field crops
 - Complete shielding (tunnel-sprayers) in case of trees and high crop s like grapes
 - Wind speed at application < 3 m/sec
 - Last nozzle in the row at the machinery directed inwards.
2. Ensure pesticides are not emitted to the air. We believe a clear quantitative standard is necessary to make enforcement of this principle possible and propose to take **0.01 ppb as the standard to be applied as a maximum**. This standard will be enforced by analysing the air down-wind at 5 meter above ground. The following provisions are necessary to prevent air pollution:
- Application of pesticides at low temperature, not exceeding 15 grades Celsius.
 - No application of volatile pesticides, chemical characteristics not exceeding 0,2 mPascal.
3. Ensure best management practices of the farmer or applicant. Even with the best machinery everything can still go wrong with bad management practices. Farmers and applicants should be trained on best management and get a certificate to be renewed every 2 or 3 years. The following provisions should be included in the instructions given by machinery suppliers:
- Neighbours and bystanders should be given an advanced warning 24 hours before spraying to protect people and animals (like bees and pets).
 - The no-spraying zone at the edge of the field should not be sprayed at all
 - Before turning at the field edge, spraying equipment should be stopped in advance
 - Filling and cleaning should be done at special (soil-protected) sites
 - No water from ditches and canals will be used to dilute the pesticides in the machinery
 - Instruction of applicants on wind-speed and temperature.

Brussels, 11 December 2008.