Project Number 60 (Draft Revision of OIML Document D 16 Principles of assurance of metrological control) - Mo...

http://bureau/vote/details.html

OIML

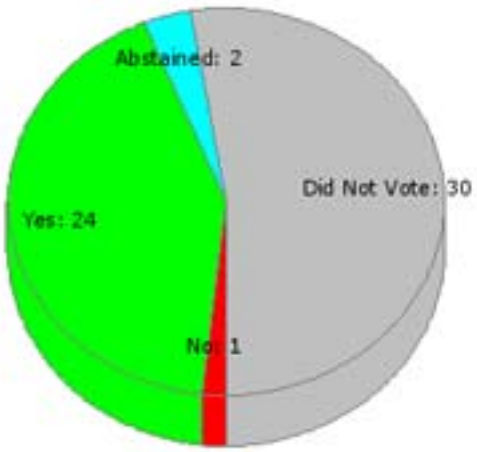
Project Number 60 (Draft Revision of OIML Document D 16 Principles of assurance of metrological control)

Deadline: 2010-07-01

NETHERLANDS voted No (Comments)

AUSTRIA voted Yes (Comments)
CANADA voted Yes
CYPRUS voted Yes
CZECH REPUBLIC voted Yes
DENMARK voted Yes
GERMANY voted Yes
HUNGARY voted Yes
IRELAND voted Yes
ISRAEL voted Yes
JAPAN voted Yes (Comments)
KAZAKHSTAN voted Yes
KENYA voted Yes
MONACO voted Yes
NEW ZEALAND voted Yes (Comments)
P.R. CHINA voted Yes
POLAND voted Yes
ROMANIA voted Yes
SERBIA voted Yes
SLOVAKIA voted Yes
SWITZERLAND voted Yes
TANZANIA voted Yes
TURKEY voted Yes
UNITED KINGDOM voted Yes (Comments)
VIET NAM voted Yes

NORWAY Abstained (Comments)
UNITED STATES Abstained (Comments)



Terminé

Apache

BEV-Bundesamt für Eich- und Vermessungswesen Austria

D16 „Principles of assurance of metrological control“

We want to thank the secretariat for elaborating the draft and have just one comment:

6.2.1, 3rd paragraph:

In Austria verification has been passed over to accredited private verification bodies for all measuring instruments under metrological control except axle weighing systems, breath analyzers and traffic speed measurement systems since 2004.

Comments from Japan on the 3rd Committee Draft for the international document No. 16 "Principles of assurance of metrological control"

Note: These comments are same as our comments submitted in May 2009,
however we strongly request these comments will be reflected in the next committee draft.

No	Country	Page number	Clause	Comments
1	Japan	12	**4.7**	The meaning of the phrase "total systems approach" is not clear. It should be defined in Section 2 "Terminology."
2	Japan	20	**6.2.2**	Specific country name should not be used. Replace "the American model" with "an example." In addition, delete the last sentence "Some States in the USA currently use this model" since this paragraph describes the domestic situation of the USA.
3	Japan	21	**6.2.3**	Specific country name should not be used. Replace "the Dutch model" with "an example." In addition, delete the sentences "In The Netherlands, however, subsequent verification is mandatory after repair or when a seal is broken" and "Such a system is used in the Netherlands."
4	Japan		**Annex 3**	Japan supports the comment from the Netherlands about D16 revision (1CD). This annex should be deleted. <Reason> It is not appropriate to reprint the paper in OIML Bulletin itself as "Document". The Secretariat (Czech Republic) already pointed out as follows. It is clearly stated that annex 3 is merely an example of Australia. However, as long as annex 3 is described as "Document" of OIML member countries, it gives impression that each country agreed unanimously on this point. The "Conformity to type" WG was scheduled to be held in Sydney in October last year. It is not reasonable to include such an annex to this document before any conclusion is reached on this point.

Comments on:	*DD Revision OIML D 16 Principles of assurance of metrological control*	
Country/Organization	The Netherlands	10 June 2010

Clause number	Member State comments
General	First again my complements on the document, which I think is very useful for national autorities when implementing legislation regarding metrology. This although my general remark on the last draft is still applicable being that in some parts of the document, especially the last chapters, sometimes references are given to TC or SC projects or other work in progress. Since these projects are meant to finish in a limited period of time, the present document will become more or less out-of-date soon after its completion. (See e.g. comment on 5.2. b) Furthermore I noticed that you have made some amendments on the editorial comments and suggestions I made. However on some clauses, which are highly disputable, there have not been made the changes such that further progress of the draft document can be accepted without these clauses being amended in such a way that they no longer are in conflict with real life. Like the subject discussed in 6.2.11. Although there is some reason for focussing somewhat more on this subject it should not be presented in D16 in such detail while this subject, originating from a German project, is at present still being discussed between PTB and a "Eichamt" Each of the figures give is disputable. Therefore the only way of presenting this subject could be by making reference to a final publication of this research project. Another issue which forces me to cast a negative vote is the fact that no response has been given to the objections on 6.2.3. There also is a lack of overview on comments given by the members of the SC and the responses from the TC 3/SC 2 secretariat. For your convenience the underneath comments comprise those given to the 3CD, those leading to the negative vote are coloured **red**
	Comments on 3CD
2.17 2.18 2.21	Please be aware that these terms have also been definited in the EC Regulation 765/1008 *"on setting out requirements for acreditation and market surveillance relating to marketing of products"*. (available on internet http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:218:0030:0047:EN:PDF) Of course the OIML wording should prevail, but one should try to omit conflicts. I would suggest to use *"legal entity"* or *"legal person"* instead of *"business"*.
5.2.(b)	To eliminate confusion I suggest to change the second line to: "...for verification are at present not taken ...." Last sentence first paragraph: Change " – *it should be the aim..*" in " - *it is the aim...*" Otherwise this sentence would mean that it is yet not the aim of project p2 to resolve the contradiction. Furthermore this direct reference to project p2 could make the new D 16 rapidly out of date, since it is to be expected that the project will end within a short period of time. I suggest to refer to " development of a document on "expression of uncertainty in measurement in legal metrology applications" within this subcommittee"
5.2.(c)	This text is unclear. I suggest to undo the amendment and replace it by the 2CD text
6.1.1.2	I suggest to change last but one sentence in: "*In those cases where this is not performed by the manufacturer himself, an independent, competent, third-party body should be available to perform the initial verification (assessment of conformity with the approved type).*"

Clause number	Member State comments
6.1.1.4	Change 1th sentence *"removed"* to *"taken away"* Change 2nd sentence, last part in.. *"..from both a financial as well as a logistical point of view."* In the 3th sentence the modification in the word *" remains"* should be undone, since manufacturer or owner/user is singular.
6.1.2	3th sentence : *"Obviously, if this practice would become widespread,…."* 6th sentence : *"…..control be may be called into question."* Probably you mean by *"…., the use of instruments at the market." " …on the instruments in use."*
6.2	3th line *"…put into service";* last line *" …..exemplified by means of three…"*
6.2.1	Suggest to change first paragraph for readability to: *"Subsequent verification of legally controlled measuring instruments (which is charged to their users) complemented by actions of in-service surveillance as a form of metrological supervision (the German model) – see OIML D 9"*
6.2.2	5th sentence: Change *"liability"* to *"weakness"*
6.2.3	As far as we are informed the extended in-service surveillance MPE´s normally also are applicable for subsequent verification. And normally the non-extended MPE´s are applicable for type test and intitial verification only. Therefore there should not be any discrepancy in practice between the error ranges found in-service between the NL system and a periodical subsequent verification system. Therefore delete second paragraph
6.2.6	Although I can agree with your conclusion that *" …adjustments are a grey area"* I think the preceeding text is not in line with the calibration practice in metrology *in general*. The definition "calibration" excludes explicitely verification and adjustment. Only on explicit request of the user/customer the verification and adjustment may be performed. This last mentioned procedure is probably more usual in legal metrology. I therefore suggest to add the text : *" within legal metrology"* just after : *"On the onther hand…"* in the 3th sentence. change*: " the user might not be no longer…."* in last sentence to: *"…the user might no longer be…."*
6.2.7	Change: *"Verifications (initial and subsequent) used….. "* into *"Verifications (initial and subsequent) are used…..* With: *"With the advent of communal meters like electricity meters, gasmeters, water meters, heatmeters etc., often manufactured on highly automated production lines and installed in batches…..."* I assume you mean *" With the advent of manufacturing of utility meters , like electricity meters, gasmeters, water meters, heatmeters etc.… on highly automated production lines and installed in batches……"* last sentence change *"..with utilities.."* into *"…with utility companies…"*
6.2.10	Remark on third sentence : In NL this is covered by law already for quite some years.
6.2.11	Having performed type approval including EMC tests on Nawi´s and being responsible for EM field references at the NMi Van Swinden lab during the last 23 years, I would say that several parts of the text in 6.2.11 are highly controversial. This paragraph needs to be supported by references to relevant reports and documents , including e.g. IEC 61000-4-3 (2006) which can give a rational to the expected amplitude of the fieldstrength. Furthermore e.g. the interaction between transmitting source and disturbed measurement device will be near to random. The chance on a change of indication in the (for a swindler) desired direction to an acceptable level and stability is therefore very unlikely.
6.3.4	Last (added) 2 sentences need to be re-edited in order to understand what is meant.

Review of OIML D 16 – Principles of assurance of metrological control

Clause 2.8 Conformity assessment – (all statutory requirements applicable) checking not only for metrological requirements but also against requirements relating to safety, ease of use (But we do not assess this)

Clause 2.9 – We do not confirm that the instrument will provide reliable results over a defined period of time – i.e. we do not have sunset clauses on certificates.

Clause 2.10 – After carrying a verification test there is no mandatory re-verification periods.

Clause 2.25 – "Field Surveillance" – during surveillance we do not evaluate the proper use of the instrument.

Clause 4 – Most of the general information in this document is already in place in New Zealand and we have been following in one form or other..

Clause 4.5 – Not only manufacturers must also include submitters (most applications in New Zealand are from submitters rather than manufacturers. Usually the manufacturers are outside of New Zealand. (Applications are either overseas, in-situ or variants)

Clause 4.6 – Measurement process performance is highly dependent on instrument capability, "operator certification" to protect against fraud. This principle can be applied in relation to use of proper instruments for measuring appropriate products. Currently there are no provisions for requiring certain instruments to be used with certain products. Future legislative review may look to address this.

Clause 5.1 (b) – Currently we do not have provisions for uncertainties in verification testing in our regulations.

Clause 6.1.1.2.A – Immediate paragraph after 2nd bullet point – this is not inline with our regulations – any weight or measure or weighing or measuring instrument must be of an approved type

Clause 6.1.2 – New Zealand does not have the resources to conduct CTT testing once equipment has been approved, in order to ensure manufacturers do not just submit gold plated patterns for approval. However we would be interested and willing to take part in a joint approach with other legal metrology authorities e.g Australia. The extent to which this may be done or is feasible would be a major consideration in determining how the system could work.

Clause 6.2.11 – Currently we do not conduct testing for radio wave interference once the equipment has been approved and is in-service, we do not conduct post market metrological control inspections (influence factors).

Justervesenet

Norwegian comments to the Draft Revision of OIML Document D 16:

We find chapter 3 Principles of assurance of metrological control, to be good being the main content of this Document.

In chapter 6.2, however, it is not clear to us if this is just a description of some systems used today or if they are recommended systems. Further in this chapter it seems that one is jumping to conclusions for the different systems that have the background in the present situation in some few countries like “burdens for the user”, “reduced state budget” etc. To our understanding, a system must be designed taking into account the total cost for the society, regardless where the cost is put. There may be other reasons that, as an example, fees to the user have a negative effect in such a way that the user try to avoid having instruments verified but this has basically nothing to do with the total cost for the system.

We would like chapter 6 to be further looked upon from a socio-economic point of view if it shall give some good guidance when designing a system for assurance of metrological control.

30.06.2010

Knut Lindløv
director Legal Metrology

Norway

Draft Revision of OIML Document D 16 "Principles of assurance of metrological control

Online CIML Approval due 1st July 2010

Comments from the United Kingdom

Section	Comment	
6.3.2	Suggested additional sentence to be added at the end of 6.3.2 – "Difficulties can occur where the importer and his stock are in different legal metrology authorities' areas; there will be a need for suitable liaison and sharing of information so that the location of the prepackages are known to enable appropriate checks to be made."	
6.3.4	Last sentence of 6.3.4 – Suggest the word 'that' should be replaced with 'at'.	

Peter Mason

United Kingdom CIML Member

21 June 2010

U.S. Comments on Draft International Document D16

June 28, 2010

We note that this draft of D 16 is considerably improved over previous drafts. We particularly like the approach of looking at different legal metrology practices and issues worldwide.

Our major concern remains to be the lack of clarity of the use of certain terms and concepts, which sometimes leads to confusion in what is intended in the text. Most notably, the title of the document, "Principles of assurance of metrological control," leads to problems of circularity, since the definition of "legal metrological control" in 2.2 is "the whole of legal metrology activities which contribute to metrological assurance," which itself contains the term "assurance," which is not defined anywhere! Further, in 2.5, the definition of "metrological supervision" begins with "control …". This is a highly unsatisfactory situation that needs to be addressed, not only in D 16 but in the ongoing revision of the VIML and in D 9.

We feel that the D 16 document could benefit from one or more figures that demonstrate the (hierarchical?) relationships among the key terms and concepts, similar to what is done in D 9, although we find the figures in D 9 to themselves be confusing and in need of improvement.

Accordingly, we propose that D 16 be restructured to first identify all of the different tasks associated with legal metrology (defined as the "practice and process of applying regulatory structure and enforcement to metrology"), and then describe the different ways that different countries/systems name and handle these tasks, preferably without invoking the terms metrological control, metrological supervision, metrological assurance, metrological expertise … The different uses of the term "market surveillance" around the world also needs to be better elaborated.