



Comments from CIML Members on CIML draft dated 2010.05.12 of the revision of the Directives for OIML technical work

Version 2 – Comments and BIML responses – 16 September 2010

1 Background

When the 2010.05.12 draft of the Revision of the Directives was distributed to CIML Members for comment, Australia submitted a useful summary of the project so far, reproduced below and modified slightly to bring it up to date:

- The work of revising the Directives began with a BIML brainstorming exercise on the problems with the existing systems. This enabled some preparatory work to be undertaken.
- In 2002 a first draft revision was presented to CIML members for comment. This was followed in 2003 with the establishment of an ad-hoc committee by the CIML:

"12.1 Revision of the Directives for Technical Work

The Committee took note of information given by the BIML on the draft Revision of the Directives and instructed the BIML to set up an ad-hoc Committee to continue the Revision of these Directives with a view to simplifying the procedures, accelerating the development and revision of Recommendations and Documents, and taking account of the requirements of the WTO-TBT Committee on international standard-setting activities. This Revision will be submitted to the CIML for approval as soon as possible."

- Several meetings of the committee followed, which oscillated over a number of issues, depending on composition of ad-hoc committee at the time, including whether there should be a TC/SC structure or flat structure, and how the work should be managed.
- Australia raised the matter in the March 2009 Presidential Council in an attempt to resolve this impasse and provide guidance to the BIML. The Council agreed on a flat structure.
- Australia called a small WG meeting in Switzerland in June 2009. An Ishikawa analysis was used to analyse the problems with the current directives that needed to be addressed. The flat structure was given further consideration and was retained.
- Draft 3 was prepared, incorporating a flat structure.
- A presentation was made at the 44th CIML Meeting in Mombasa that outlined the proposal and received support from the CIML:
 - "Resolution no. 13:
The Committee took note of the progress on the revision of part 1 of the Directives for OIML Technical Work and requested the Bureau and the Working Group to complete this revision with a view to submitting it to the CIML at its meeting in 2010 for approval."
- The proposal was then circulated to CIML members in January 2010 to provide the opportunity for all CIML Members to comment.
- The issue was given further consideration at the March 2010 Presidential Council meeting. Once again the issue of the TC/SC structure was raised and it was decided to retain the flat structure for the reasons given in Ian Dunmill's paper: simplicity, flexibility and the ability to address the deficiencies of the current TC/SC structure.
- A draft was then distributed to all CIML Members in May 2010, asking for comments by 12 August. These comments are collated in this paper.

2 Replies to request for comments on this draft

After the initial request for comments, two reminders were sent to CIML Members asking them to comment on this draft. By the date of preparation of this second edition of these collated comments, 16 September 2010, **twenty seven** Member States (47 % of the total) had replied:

Algeria, Austria, Brazil, Canada, Croatia, Cyprus, Denmark, Finland, Germany, Hungary, Ireland, Japan, Kazakhstan, Netherlands, Norway, Poland, Russian Federation, Serbia, Slovakia, South Africa, Spain, Sweden, Switzerland, Tanzania, UK, USA, Viet Nam

Eleven of the replying Member States said that they had no comments:

Algeria, Croatia, Hungary, Ireland, Kazakhstan, Russian Federation, Slovakia, South Africa, Sweden, Tanzania, Viet Nam

One other Member State has indicated its intention to supply comments:

Australia

An automatically generated e-mail reception message for the last reminder sent on 12 August was received from **eleven** other Member States (19 % of the total) who these have not since replied:

Belgium, Bulgaria, Czech Republic, France, Israel, Italy, Macedonia (F.Y.R.), Monaco, Morocco, Slovenia, Turkey

No reply was therefore received from **thirty** Member States (53 % of the total), and of these, there was no response at all from **eighteen** Member States (32 % of the total).

3 Main non-editorial topics covered by the comments

Apart from the editorial comments, those of technical matters fell into the three main subject areas:

- the structure of the committees,
- the management of the technical work,
- the system to be used for approval of publications.

These are summarised below.

3.1 Structure of the technical work

Objections to the proposed changes to the structure of the technical work were received from:

Brazil, Germany, US

3.2 Oversight of the technical work

Objections to the establishment of a Technical Management Council were received from:

Brazil, Denmark, Finland, Norway, Poland

Changes to the draft's description of the TMC were proposed by:

Germany, Netherlands, Spain, Switzerland, US

3.3 Single CIML approval procedure

Objections to the proposed single procedure for the approval of all OIML publications were received from:

Germany, US

4 Next steps

At the 45th CIML Meeting, I will make a presentation of the work so far on this revision of the Directives and go through some of the arguments on the main issues. CIML Members will then be given the opportunity to put their points of view and discuss the comments. The CIML will need to conclude the discussion with clear guidance on the future of the revision.

Ian Dunmill

16 September 2010

Annex
Comments received from CIML Members

Paragraph	Country	Comment	BIML response
General	Algeria	No particular comments.	-
	Austria	We agree with the document. One comment: list of abbreviations would be helpful for less experienced readers	Use of acronyms will be reviewed.
	Canada	Although we would like this work to be completed this year, there appears to be a lack of consensus on the current document and an alternative to the flat structure is being proposed by USA (3-tier structure). Considering the high importance and impact the implementation of this document would have on OIML technical work and BIML operations, we believe the proposed document should not be presented for CIML vote and adoption at the September CIML meeting unless the comments received from CIML members in August are minor and the 3-tier and the flat structures are explained and discussed at the CIML meeting and there is CIML consensus to vote and adopt the proposed document with the flat structure. If these two conditions are not met, we believe the workgroup should be asked to finalize the document and present it for CIML adoption in 2011.	At the CIML Meeting, the BIML will report on the work done since the last CIML Meeting and on the results of the CIML consultation. The structure proposed in the current draft will be explained and Members will be invited to present their positions. The future of the draft will need to be decided at the meeting.
	Croatia	Regarding your e-mail herewith enclosed, please apologise for our late reply. As regards the Draft revision of the Directives for CIML comment, please note that Croatia agrees with the wording and has no comment.	-
	Cyprus	(a) Even though I replied to your e-mail dated February 1st, 2010 [BIML Mailing #336] (see our attached replying e-mail), you did not include Cyprus comments among the comments of the Countries which replied on or before the deadline of March 1st, 2010. (b) Relating to your modified draft, I have no further comments besides the ones shown on my e-mail dated March 1st, 2010 [<i>included in the relevant sections below</i>].	Sorry for not having included your comments previously. I did not receive the e-mail. The comments are replied to below.
	Germany	Preliminary remarks	

		In the light of the comments from CIML members on draft 3.1, and the new CIML draft, we have reconsidered our opinion on the three „specific questions“ as follows <i>[detailed in the specific sections below]</i> .	
	Hungary	Concerning your letters of 11/08/2010 may I inform you that in connection with the Revision of the Directives for OIML technical work and the structure of OIML technical work we have no comments.	-
	Ireland	With reference to the draft revision of the Directives, I wish to advise that we support the proposal as circulated.	-
	Japan	We strongly request that any important document, which is closely related to basic policy and/or technical work of OIML, will be approved by the CIML members as it is in present.	Under the current proposals, all publications other than Guides and Expert Reports would be approved by the CIML.
	Kazakhstan	Kazakhstan has no comments for the revision of the Directives, the official letter is coming soon.	-
	Netherlands	Like you requested in your e-mailing sent on 12 May 2010, we have studied your response on our previous comments and the new draft document. We are happy to observe that you were able to implement changes such that many of the NL comments have been dealt in line with the suggestions. Please find attached some further comments, most being editorial. As regards contents they mainly concern the TMC composition, responsibility and operation. Our suggested amendment to 3.5 would implicate cover the need as previously indicated (comment on 4.1.5 of the wd) for objective criteria on agree or disagree on a project.	-
	Norway	We know that we are far too late but it may anyway be useful to give our position: we are strongly in favor of simplifying the structure. By introducing the TMC this will introduce a new layer in the organizational structure, reducing the effect of simplifying. In our view, the tasks proposed for the TMC should partly be by the CIML and could partly be by the president. We are not in favor of introducing the TMC.	
	Russian	Russian Federation doesn't have any	-

	Federation	objections to the clean version of the Revision of the Directives for OIML Technical work.	
	Serbia	According to comments from CIML Members on draft 3.1 of the revision of the Directives for OIML technical work the present Revision of the Directives for OIML technical work Part 1: Structures and procedures for the development of OIML publications (CIML draft of 2010.05.12) looks as the best fit. We are of the opinion that further general comments have no sense at this phase. By this we are sending you the following suggestions. <i>[for 3.6 and 4.1]</i>	-
	Slovakia	Referring to the mentioned below e-mail concerning the Draft revision of the Directives for CIML comment I would like to let you know that Slovakia agrees with the wording and has no comment.	-
	South Africa	I have no comment.	-
	Spain	Thank you very much for the work you have done.	-
	Sweden	Sweden has no comments on the Draft revision of the Directives for OIML Technical Work.	-
	Switzerland	Thanks a lot for this new version. I appreciate a lot the work done and I am very happy with the present version. I only have a few comments: <i>[on 4.1 and Annex A.4]</i>	-
	Tanzania	Tanzania has no comment.	-
	UK	Thank you for the opportunity to review the May draft of the Directives for OIML Technical Work. I have received little in the way of additional comments but would say that we think the changes to the latest draft are an improvement. Our basic position is unchanged from our remarks made on the previous draft and sent to you in February Two additional points are as follow: 1. Although there is extensive reference to 'liaison' organisations throughout the document, we would suggest adding a simple statement somewhere which encourages TCs to engage with liaison organisations which represent industry and for them to be members of the TC.	1 The section on Composition of TCs will be amended to clarify the issue of liaisons and to encourage members of TCs to include as many stakeholders as possible. 2 The use of acronyms will be reviewed.

		2. Some acronyms are used for the first time in section 2, is it worth defining them here or elsewhere? The use of acronyms within the document is also a little inconsistent, that is, sometimes used, sometimes spelt out.	
	US	<p><u>We do not agree with the procedure being used to develop the next draft.</u></p> <p>Insufficient time is being proposed for the CIML's consideration of the next draft (the draft being developed after this August 2010 set of international comments) prior to the 45th CIML Meeting in Orlando.</p> <p>Note that both the current and proposed new Directives specify that at least three months shall be provided for review of such documents.</p>	At the CIML Meeting, the BIML will report on the work done since the last CIML Meeting and on the results of the CIML consultation. The structure proposed in the current draft will be explained and Members will be invited to present their positions. The future of the draft will need to be decided at the meeting.
	US	<p>Since one of the purposes of the new Directives is to accelerate the work, we have a suggestion that OIML/BIML invest in an information system to assist the Secretariats in their work, similar to the systems used by ISO and IEC.</p> <p>We suggest that a web page be developed that can be used for dissemination and voting on CDs. This way, voting statistics could be automatically collected for each CD, relieving the Secretariat of having to report transgressions, and automating the decision about whether a CD has passed or not (<u>the voting rules can be built-in, so that the expressed concern about having to remember different voting rules would be reduced or even eliminated</u>).</p> <p>We also suggest that an online TC/SC project membership page be developed so that P and O representation on a TC/SC project can be directly assigned/modified online by the CIML Members.</p>	<p>I fully agree, having used the ISO system. I think we can even learn from some of the shortcomings of their system.</p> <p>Even though the voting rules could be built in to such a system, I think it is far better to have clear and simple rules to improve transparency and Members' understanding of the OIML's operation.</p> <p>I agree that it would be better for CIML Members to be able to manage their own participation information directly online, as it would for their personal information. This would be covered at the stage of implementing these Directives and any changes to the structure.</p>
	Vietnam	<p>Vietnam has no comments on the Draft revision of the Directives of OIML technical works.</p> <p>Thank you so much for you kind cooperation.</p>	-
Structure of the technical work	Brazil	We think that the current structure of TC/SC should be kept, TC secretariat acting as a group leader or adviser and being responsible for the revision of the Committee Drafts released by the SCs.	The subject of the structure will be discussed at the CIML Meeting. However, the TCs do not

		<p>We also believe that in general there are not significantly different instruments in the same committee, and that the reason for having some instruments put together in a given TC is sound.</p> <p>At last, we think that the management of a flat structure would bring a huge work to a supervising committee or board, since the number of TCs would become too high.</p>	<p>currently act as advisers or group leaders to their SCs. This was the case under the previous Sr/Sp system prior to the 1990s, but was dropped in the interests of accelerating the work. To reintroduce it would slow down the work and require Member States to allocate considerable resources to take on a TC.</p> <p>The management of the work under the proposed system would be little changed from now, where an informal group reviews all TC/SC projects once or twice per year. Under the proposed system, each project has its own committee, and the management is more formalised.</p>
	Cyprus	<p>I would like to inform you that Cyprus finds the proposals for a new structure very interesting. After a review of the relevant documents, we believe that:</p> <ul style="list-style-type: none"> - With the proposed new structure for the TC/SCs, problems, such as the irregular distribution of work, difficulties in fitting new instruments into an appropriate TC/SC, etc, will be avoided/solved. 	-
	Germany	<p>Although at first glance a flat TC structure seems to have some advantages, we do no longer support this proposal; we rather prefer to keep the existing TC/SC structure.</p> <p>Rationale:</p> <p>We share many objections expressed by the USA. In particular we agree that...</p> <ul style="list-style-type: none"> (i) ... a flat structure will not reduce the workload or make the process more efficient; the technical work must be done anyway. (ii) ... a flat structure could be viewed with skepticism by outside standards developing organizations, such as IEC or ISO, which are used to a hierarchical technical committee and subcommittee structure. (iii) ... the existing TC/SC structure has many advantages; it offers, for instance, 	<p>The subject of the structure will be discussed at the CIML Meeting.</p> <p>Please see the US comments for more detailed replies to the individual points</p>

		<p>the possibility for a TC secretariat to bring together and coordinate technical work on similar or depending measuring instruments, e.g. moisture meters for cereal grains (TC17/SC1) and instruments for quality analysis of agricultural products (TC17/SC8).</p> <p>(iv) ... the measuring instruments were placed in a specific subcommittee for a logical reason with a logical structure surrounding the TC/SCs. Much of the logic of that structure and the coordination of committees working on “related” instruments would be lost in the proposed revision. An example is TC9, which is responsible for load cells, non-automatic weighing instruments (TC9/SC1) and automatic weighing instruments (TC9/SC2). In addition, the automatic weighing instruments demonstrate the problems we would have with a flat structure, because TC9/SC2 is responsible for six OIML recommendations (R50, R51, R61, R106, R107, R134) which means that we would have to create six new TCs instead of TC9/SC2.</p> <p>(v) ... to fit new instruments into an appropriate TC/SC is no difficulty. Compared to the number of TCs we would create with a flat TC structure, it should be no problem with the existing tools to create a new TC for “exotic” instruments. Other international organizations provide special TCs, e.g. for interdisciplinary topics, too.</p> <p>In addition, we question whether the new flat TC structure and its consequences are sufficiently thought-out. Hence, chapters 3, 4 and 5 of the new CIML draft document still leave many questions open in this regard, see our respective comments.</p>	
	Poland	<p>... we would like to express our general support for the proposed flat structure of the technical work. It is necessary to simplify the procedures and make the process of decision making more transparent. The proposed structure could definitely bring us one step closer to achieving that goal, making it easier to distribute work among committees more evenly as well as enabling Member States to participate only in the projects they are interested in.</p>	-

	<p>US</p>	<p><u>We oppose the proposal for disbanding the existing TC/SC structure and moving toward a structure where each document and each project has its own Technical Committee (at least tripling the number of TCs).</u></p> <ul style="list-style-type: none"> • We believe this change could create many more problems than it solves. For example: <ul style="list-style-type: none"> – The fact that different countries could have Secretariat responsibility for closely related documents (this is presently not occurring because Secretariats have responsibility for all documents/projects in the TC/SC) could lead to conflicting approaches being taken, conflicting or duplicate requirements, and lack of coordination that could lead to inefficiencies and increased costs (e.g. meetings scheduled at different times and locations throughout a year because Secretariats plan meetings without consulting each other). – Identifying which Technical Committees are working on closely related subject matters may not be as obvious as it is now (they are currently all under the same SC or TC) and it is unclear how the coordination would be facilitated. Would the BIML be asked to assume that responsibility, and would/could they? – Going to a ‘flat’ structure would be a major departure from the current structure and would be different than how Technical Committees are structured in most other international standards-writing organizations such as ISO, IEC, etc. We believe that such a ‘flat’ structure could be viewed with skepticism by these outside standards developing organizations, which are used to a hierarchical Technical Committee and Subcommittee structure. This could lead to their loss of confidence in the work of OIML. – Some of the less popular 	<p>The subject of the structure will be discussed at the CIML Meeting.</p> <p>However, I would make the following observations on some of the specific points:</p> <p>The number of TCs is not really relevant. One of the main objectives of this review was to introduce the possibility of being a P- or O-member of individual projects. Once that is accepted, there is in fact less administration necessary if they are separate TCs, leading to a far more transparent and easily understood system.</p> <p>There seems little risk of conflicting meeting schedules given the current level of OIML technical work, and in any case this is easily managed with a public calendar of technical meetings managed by the BIML.</p> <p>The issue of closely related topics could, I believe be better managed under the proposed system, since the system would be more flexible. Each TC could be considered to have a common interest in a number of different “themes”, which means that communication could easily be organised between different TCs in a more interactive and relevant way than is now the case.</p> <p>I am not sure on what evidence the issue of other organisations’ scepticism is based. I have discussed this issue at the highest level with ISO and the IEC, and they do not have any concerns at all. In fact, ISO is currently looking at alternatives to its normal standards development</p>
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		<p>documents could be left without a Secretariat as, currently, a country that assumes Secretariat responsibility for one TC or SC assumes responsibility for all documents in their TC/SC.</p> <ul style="list-style-type: none"> We believe this change will <u>not</u> reduce the workload or make the process easier or more efficient; the workload will just be shifted. 	<p>process to be used in certain cases, and the IEC is undertaking a complete revision of its TC system, which it feels has grown randomly and somewhat illogically over its history. The workload will indeed remain the same, since it is the number of <u>projects</u> which is important, not the number of TCs. The fact that we currently have TCs and SCs which are responsible for nothing indicates weaknesses in the current system and presents an inaccurate face of OIML technical work. However, during the implementation process it may well be found that there are projects which are not relevant to legal metrology or which have little hope of becoming active in the near future. In this case, the apparent workload could be reduced, again leading to a transparent information on our work.</p>
	US	<p>We <u>disagree</u> with the earlier BIML comment that there are “significantly different instruments in the same committee” (with only a few exceptions). The measuring instruments were all placed in a specific subcommittee for a logical reason with a logical structure surrounding the TC/SCs. Much of the logic of that structure and the coordination of committees working on “related” instruments could be lost in the proposed revision.</p>	<p>Again, this will be part of the discussion on the structure at the CIML Meeting.</p>
	US	<p>We understand that (occasionally) a Member State may not want to be a P-member (and thus be required to vote) on all of the projects in a subcommittee. There is <u>NOT</u> a need to completely change the existing TC/SC structure to respond to this issue. We propose the following alternative that would address this issue:</p> <ul style="list-style-type: none"> the concept of “P” and “O” membership in a Technical 	<p>The subject of the structure will be discussed at the CIML Meeting. The concept of P- and O-membership is not changing. The proposed voting rules are simply applying those given in the Convention to all decisions. This seems a more understandable</p>

		<p>Committee and Subcommittee could be changed and applied to each project within a Subcommittee.</p> <p>It is worth noting that if the new voting rule proposed in 5.7.2 (where it is proposed that “Abstentions and failures to reply are not considered as votes cast”) is adopted, then there would no longer be a need to change the existing TC/SC structure (or the meaning of P-membership and O-membership). Allowing even P-members to not vote in the current TC/SC structure would then not slow down the voting process. However, since consequences for P-members not voting remain (see 5.3), we feel that implementing the alternative given above would still be the best way of proceeding within the current TC/SC structure.</p> <p><u>We feel that changing the meaning of P-membership and O-membership, and the proposed new voting rule(s), are quite significant changes and need more discussion and consideration in the Ad-hoc Working Group (and among the CIML Members) before voting on the next draft.</u></p>	<p>way of proceeding than inventing different rules for each case.</p> <p>One of the main objectives of this review was to introduce the possibility of being a P- or O-member of individual projects, since this has been an expressed need from a number of Member States for many years (at least 15 years according to my personal experience).</p>
	US	<p>One of the reasons offered for a ‘flat’ structure is that it is sometimes difficult to fit new instruments into an appropriate TC/SC. We do not see this as a “difficulty” but rather just part of the well-established process of accomplishing the OIML work. There are already detailed procedures in place to establish a new TC/SC (or change the scope of an existing TC/SC) to accommodate a new field of technical activity. (Sections 2.6 and 2.7 of the 1993 Directives.)</p>	<p>The subject of the structure will be discussed at the CIML Meeting.</p>
	US	<p>We have experienced that any time a Member State vacates a Subcommittee Secretariat position that there are often lengthy “gaps” (sometimes 2+ years) in the volunteering/assignment of a new Secretariat and the accomplishment of any meaningful technical work. We are quite concerned that these “gaps” would be increased by the number of new Technical Committees when every single current Technical Committee and Subcommittee is disbanded under this proposal for a new structure to accomplish the technical work. We believe that this would be an enormous</p>	<p>There is no intention for the TCs to be disbanded as such. The transition would simply allocate, in the first instance, the secretariat and members of each current TC or SC to each of its projects, except where a WG has already been established for a particular project. The change should thus be transparent and no memory need be lost. Please see the paper on</p>

		problem and would also cause the loss of a significant amount of “corporate memory.”	the proposed transposition.
Oversight of the technical work	Brazil	We do not think that a Technical Management Committee is needed. We believe that the technical work should be developed in a structure of TC/SC with the TC secretariat being responsible for the revision of the CD. We support Japan’s comment that important issues in technical work would still be discussed among the CIML members and/or Presidential council.	The TMC was re-introduced to deal with concerns expressed at the last CIML Meeting about the accountability of the management of the technical work by a committee appointed by the President. It simply formalises the current arrangements. In any case, this subject will be discussed at the CIML Meeting.
	Cyprus	- The proposed system for managing the technical work is simplified, more functional and efficient.	-
	Denmark	Denmark is not in favour of reintroducing the TMC. The tasks for the TMC as stated in 3.5 should be performed partly by CIML and partly by BIML: dot 1, 6, 7, 9, 10 by BIML dot 2, 3, 4, 5 by CIML dot 8 is not relevant if TMC is not established dot 11 by BIML and CIML together	The TMC was re-introduced to deal with concerns expressed at the last CIML Meeting about the accountability of the management of the technical work by a committee appointed by the President. It simply formalises the current arrangements. In any case, this subject will be discussed at the CIML Meeting.
	Finland	Due to unfavorable conditions we were not able to comment the previous version of the document. Our comments to the latest draft are the following: We were surprised by the reintroduction of the TMC and think this approach is not favorable. Instead finding a good balance between the duties of the CIML, BIPM and the President(s) should lead to an acceptable end result. We see the CIML as the main decision making body and think that it should decide on - approving technical work projects; - establishing and disbanding TCs; - allocating initial TC secretariat;	The TMC was re-introduced to deal with concerns expressed at the last CIML Meeting about the accountability of the management of the technical work by a committee appointed by the President. It simply formalises the current arrangements. In any case, this subject will be discussed at the CIML Meeting.

		<p>- Terms of Reference (ToR) and work programs for TCs;</p> <p>Within OIML we already have several established bodies: the President, two Vice-presidents, the Presidential council and naturally the BIML. It should be up to the President to manage the workload so that these resources are effectively used and divide the other responsibilities proposed to the TMC. These existing bodies should also be used as preparatory bodies for the key decisions to be made by the CIML.</p>	
	Germany	<p>We repeat our objection to the proposal that the responsibility for overseeing technical work should rest with the CIML President. In accordance with other comments, especially from Japan, Netherlands and USA, we'd rather prefer a deliberate system where the CIML, supported by the Presidential Council, keeps full control over the OIML technical work. We do, however, support a well-thought-out concept of a „Technical Management Committee“ (TMC) that is authorized by the CIML for well-defined management tasks (where the task sharing with the BIML and the CIML President are clearly defined) in order to facilitate and support the technical work of the TCs/SCs (see our comment under 2.4.2).</p> <p>Perhaps OIML could learn and consider how other international standards developing organizations deal with the oversight of their technical work, including new aspects, such as how to achieve a similar quality level for all new (revised) publications (especially recommendations), or how to (better) include „interested parties“ (stakeholders) in the OIML technical work to improve their worldwide acceptance. These aspects are not so much in the focus of OIML up to now, but are required by the TBT Agreement in Annex 3 „Code of Good Practice for the Preparation, Adoption and Application of Standards“ (see our comment under 2.1).</p>	<p>The current draft does not leave the President responsible for overseeing the technical work. The TMC was re-introduced to deal with concerns expressed at the last CIML Meeting about the accountability of the management of the technical work by a committee appointed by the President. It simply formalises the current arrangements.</p> <p>In any case, this subject will be discussed at the CIML Meeting.</p> <p>The proposed TMC is very similar to ISO's TMB which is responsible for the management of their technical work.</p> <p>The WTO's <i>Code of good practice for the preparation, adoption and application of standards</i> only applies to <u>national</u> standards-setting bodies, although I agree that the OIML and other international bodies should also follow it. I do not believe that the current draft does not conflict with its requirements.</p>
	Japan	<p>In the new structure of technical work, the role of TMC (Technical Management Committee) will be important. We hope the structure and operational rule will be fully discussed in the CIML members. We also hope the rule will be clear and</p>	<p>The TMC will be discussed at the CIML Meeting. I believe that the proposed rules should ensure equal opportunity for all Members to participate.</p>

		reasonable that provides an equal chance of participation to all members.	
	Norway	We know that we are far too late but it may anyway be useful to give our position: we are strongly in favor of simplifying the structure. By introducing the TMC this will introduce a new layer in the organizational structure, reducing the effect of simplifying. In our view, the tasks proposed for the TMC should partly be by the CIML and could partly be by the president. We are not in favor of introducing the TMC.	The TMC was re-introduced to deal with concerns expressed at the last CIML Meeting about the accountability of the management of the technical work by a committee appointed by the President. It simply formalises the current arrangements. In any case, this subject will be discussed at the CIML Meeting.
	Poland	As for the issue of the management of the technical work, we realize that for the new system to work efficiently it is necessary to introduce some changes to the existing mode of oversight. Especially in view of the proposal for disbanding the existing TC/SC structure and introducing a structure where each technical committee is assigned with one document or project, which would entail a considerable growth in the number of existing committees, we agree that the existing model of oversight needs to be reconsidered. In addition we would like to express some reservations with regards to the establishment of the Technical Management Committee (TMC). According to the new proposal, the TMC would be responsible among other things for approving technical work projects (section 3.5, dot point 2), establishing and disbanding TCs (section 3.5, dot point 3), allocating initial TC secretariat (section 3.5, dot point 4) as well as establishing Terms of Reference (ToR) and work programmes for TCs (point 3.5, dot point 5). We believe that the above mentioned competences should remain with the CIML. As for the rest of the competences regarding oversight of the technical work, in our opinion they should be shared between the President of the CIML and the BIML.	The subject of the TMC will be discussed at the CIML Meeting.
Single CIML approval procedure	Brazil	We support the proposed single CIML approval procedure since it seems to be simpler still consistent.	-
	Cyprus	- A single CIML approval procedure for	-

		all publications is better/more simple, since there is no waste of time for a second approval and avoid any confusion.	
	Germany	In accordance with the comments from Japan and USA, we prefer to keep the existing CIML approval procedures. In particular, we object the removal of the "preliminary ballot", because this offers the opportunity for the TC secretariats to clear technical disagreements and misunderstandings out well before the more formal CIML voting. Considering the long time necessary to work out a revised or even new OIML recommendation the removal of the preliminary ballot will not significantly save time.	The preliminary ballot was removed because it is a constant source of confusion. If we move to a system where final drafts are public and technical changes cannot be introduced at the stage of CIML voting, there is no need for it. Members should become involved in the work at the TC stage if they wish to make technical input. If a publication is technically incorrect, it should fail at the CIML voting stage and be returned to its TC for amendment.
	Poland	... we would also like to maintain our general support for the single CIML approval procedure for all publications. We believe that the proposed system is consistent with a general principle of simplification of the rules regulating the technical work within OIML.	-
	US	<p><u>We disagree with most of the May 2010 "BIML Response" to our previous comments on the issue of the removal of the 'Preliminary Ballot' in the CIML commenting and voting process in these revised Directives.</u></p> <p>To establish the background on this issue (explaining why we object to the removal of the Preliminary Ballot process), we have first repeated our comment from March 2010. Then, we have made comments on the specific points made by Ian in his "BIML Response."</p> <p><u>Procedures for CIML approval of OIML publications</u></p> <p>From Ian's notes:</p> <p><i>"The rules for the approval of publications have not been changed from current practice, as decided by the Presidential Council. However, those present at the most June 2009 Working Group meeting felt that the current system of holding a preliminary ballot</i></p>	<p>This subject will need to be discussed at the CIML Meeting.</p> <p>However, the preliminary ballot was removed as an outcome of the June 2009 WG meeting at which the US was present.</p> <p>One of the aims of this revision is to try to get Member States involved, and to get decisions taken, at the most appropriate and effective level.</p> <p>Members really should not be bringing up technical issues at the CIML level, they should all have been sorted out by the TCs. If there are other non-technical reasons for a Member State to object to a publication, then they are free to, and indeed should,</p>

	<p><i>and then an approval was generally confusing and a significant contribution to delays in the publication development process. It was therefore decided to remove the preliminary ballot from the process of CIML approval.”</i></p> <p><i>“This would mean that following their acceptance by the Technical Committee that developed them, and editing by the BIML, all publications will normally be approved at a CIML Meeting, with the possibility of on-line approval where necessary. It has also been decided that the BIML will closely follow and report to the CIML on Member States' responses in all on-line voting. Please also remember that under the proposed revision Directives, very little change would be allowed to Final Draft publications once they are made publicly available.”</i></p> <p>While we appreciate the effort here to reduce the time required for an OIML document to be approved, we disagree with this proposal. We have come to learn that having anything “technical” decided, debated, or changed at a CIML meeting is very rare. However, since there are sometimes non-technical considerations that enter into a Member State’s decision on how to vote on a particular document, we believe that there must be the opportunity for ALL OIML Member States (especially those that are not members of the TC/SC that developed the document) to review each document and submit a vote and comments prior to the vote at the CIML meeting. This has been accomplished in the recent past through the “preliminary ballot” process.</p> <p>We agree that this is an imperfect system – and needs improvement – but, the proposed revision would remove this important procedural step (even if it is “generally confusing”). We believe that removing this step is not the correct course of action, since it may not provide <u>all</u> Member States with enough time to review a document from all perspectives.</p> <p>This proposed revision would also, we believe, give even more authority to the CIML President (<i>now the TMC</i>) and the BIML to make technical decisions. In the current process, the document goes back to the TC/SC after the preliminary ballot</p>	<p>vote “no” at the CIML level. I agree that “no” votes at the CIML Meetings are comparatively rare, but they shouldn’t be if there are real problems. I will again re-iterate the need for Members to vote “no” unless they are happy with a publication <u>as it is</u>.</p>
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		<p>vote and comments are received – in the proposed revision, it appears that this step would be eliminated.</p> <p><u>Copied here is Ian’s May 2010 response (in italics) to the above comment – with US comments below each paragraph (in bullets):</u></p> <p><i>Apart from the Working Group’s and Presidential Council’s decisions, the majority of responses from CIML Members supported the removal of the preliminary ballot.</i></p> <ul style="list-style-type: none"> • It seems that very few (if any) CIML members have expressed any opinion at all on the issue of a Preliminary Ballot. We are not finding any written comments from another Member State on this issue. We also note that only 25% of the Member States submitted <u>any</u> comments on this most recent draft. <p><i>My experience has been that many Member States find this confusing, wondering why they are voting twice for what appears to be the same Recommendation (even if it has been back to its TC/SC for inclusion of any CIML comments between the two votes).</i></p> <ul style="list-style-type: none"> • Our experience on Preliminary Ballots is quite different. We have frequently found that having a preliminary CIML ballot for Recommendations allows more time for a thorough review by <u>all</u> CIML members, allows technical improvements to be made, allows errors to be corrected, and promotes greatly improved consensus – all making for better Recommendations. • We also want to add that another benefit of having the Preliminary Ballot is that <u>all</u> of the CIML members get a chance (prior to the CIML meeting) to see not only the comments that were provided by the P-members and O-members of the TC/SC on the last version of the Committee Draft (CD) that was passed by the TC/SC for forwarding to the CIML, but also (possibly non-technical) comments from those Member States that are not members of the TC/SC. <p><i>Currently only Recommendations have this procedure, but I’m not aware that the</i></p>	
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		<p><i>lack of a preliminary ballot affects the technical quality or validity of Documents. There is also no requirement for a preliminary ballot in the Convention.</i></p> <ul style="list-style-type: none"> We would actually support expanding the Preliminary Ballot process to include Documents. <p><i>Eliminating the preliminary ballot is also intended to encourage even more those Member States which are interested in a project to participate actively in it, and not to wait until it reaches the CIML voting stage to make their comments. All Member States and Corresponding Members are encouraged to participate in all OIML technical work.</i></p> <ul style="list-style-type: none"> While everyone would like to see more Member States actively participate in the technical work of the TC/SCs, eliminating the CIML Preliminary Ballot is in our view not the correct way to achieve this objective. <p><i>If Member States are not happy with a publication which is proposed for CIML vote, they can vote no. If enough of them do this, the publication will be returned to the TC for review, as now.</i></p> <ul style="list-style-type: none"> Our experience is that having anything “technical” decided, debated, or changed at a CIML meeting is very rare – as is an actual “no” vote at a CIML meeting. We believe it is much better to make needed improvements and achieve consensus <u>before</u> the CIML meeting. 	
Contents	US	Reference should be to 6.6.1	?
Foreword	Germany	<p>On page 6/29 (clean version) it is said: „... Annex 3 of the TBT Agreement is a Code of good practice for the preparation, adoption and application of standards. This annex actually applies to national standardizing bodies, but overall, the technical work of the OIML also complies with its aims: ■ Participation in the work is open to all OIML Member States and Corresponding Members. ...”</p> <p>We welcome the reference to the TBT Agreement and the „Code of Good Practice...“, but – in accordance with our</p>	<p>I agree and will include such a recommendation. The current involvement of all stakeholders is quite different from one Member State to another, and in accordance with the WTO’s recommendations, Members need more official guidance on this issue.</p>

		remarks under 1.2 - we recommend to add to the list that all interested parties are given the opportunity to participate in the development of new or revised OIML documents (see TBT Agreement Annex 3, substantive provisions L and M). OIML has already a good tradition to include representatives from certain manufacturers associations (especially from liaison organisations such as CECIP and CECOD) in the TC/SC work (which, of course, can and should be further improved).	
	Netherlands	Editorial: "...of the TBT Agreement even encourages..." no need for qualifying using "even" suggest deleting "even"	OK
		"Final drafts are also available." Not clear where and when and to whom these are made available. Furthermore: Is it of use here to indicate this availability ? Several options possible. Deleting is one option.	The wording of this bullet point is poor. I have changed ti to: "All OIML publications are made available free of charge on the OIML web site as soon as possible after they have been approved. Final draft publications may also be downloaded free of charge from the OIML web site."
	US	We question whether the clause titled "Relationship between the OIML and the WTO" belongs in the Directives?	It is there to indicate how the way in which the OIML develops International Recommendations fulfils the requirements of the TBT Agreement, even if this does not strictly apply to international organisations.
Add a new "Terminology" clause?	US	It seems that the document would benefit from a "Terminology" clause that contained entries such as "Technical Committee", "Final Draft", "P-Member", "O-Member", ... These are terms that are used in the document but are not actually formally defined, sometimes leaving it to the reader to find informal definitions after the term has been introduced. Cross-referencing is another option.	This will be reviewed, along with the use of acronyms.
2 title	Netherlands	.. publication amend to ...publications	Agree
2; 2.1; 2.2; 2.3; 2.4; 2.5;	Netherlands	...these Directives. See Foreword part General last	I will review this usage. "These Directives" is used

2.6 ; 5.4		<p>sentence: “This publication, the Directives for OIML technical work (called “<u>the</u> Directives” from now on) replace “these” by “the” in the applicable clauses</p>	to make it clear that we are not talking about another publication.
2.1, 2.2, 2.3 third bullets	US	We believe that it is not the “report” that is sanctioned, but rather the documents themselves.	I will review this wording. The idea here was that all technical activities should be included in a full report on presented to the Conference for sanction. This would include publications not currently presented to the Conference.
2.4 Basic publications, first bullet	Germany	Why “Normally developed ...”? Are there exceptions? Can’t we delete “Normally”?	“Normally” was included to allow for exceptions which could arise in this class of general, rather than technical, publications. However, I think it could be reworded as “Developed according to the principles of these Directives” to allow the CIML to set particular requirements if necessary, but to show that the principles of openness, consultation, etc. should still be followed.
2.4	US	In the second sentence, remove “OIML Convention” since it cannot be modified according to these rules.	The OIML Convention is a Basic publication, which is why it is in the list. This is one of the reasons for saying “normally” in the first bullet point.
2.5, second bullet	US	It seems that some of the Guides should have CIML approval (and not just be approved by the CIML President).	Recent Guides have not been approved by the CIML, although there appears to be no formal CIML decision for this. This situation would be formalised by the proposed Directives, and by definition, no publication which required CIML approval would therefore be a Guide (rather a Basic publication or a Document).
3.2 CIML,	Germany	mentions the abbreviation “TMC” for the	Use of acronyms will be

second bullet		first time; therefore the explanation should be moved from the fourth to the second bullet point, where we recommend to also add a reference to chapter 3.5.	reviewed. Cross-references will be added.
	Netherlands	2 nd bullet TMC used without previous definition move text .."the technical management committee.." from 4 th bullet to 2 nd and include definition in 3.5 and refer to 3.5 Definition could be: "The TMC is a committee consisting of a number of CIML members".	Use of acronyms will be reviewed. Cross-references will be added. Consideration to be given to adding a terminology section, as suggested elsewhere.
3.2, fourth bullet	US	Cross-reference "TC" to 3.7, or define in a Terminology clause.	Cross-reference and/or terminology will be added.
3.4, fourth bullet	US	Cross-reference "Final Draft" to 3.7 or 6.5, or define in a Terminology clause.	Cross-reference and/or terminology will be added.
3.5, 3.6, 4 TMC & BIML	Germany	(i) According to our remarks under 1.2 we consider the proposed concept for a „Technical Management Committee“ (TMC) as premature. From chapters 3.5, 3.6 and 4 it is, for instance, not sufficiently clear how the responsibilities and management tasks will be shared between the TMC and the BIML to support the technical work in the TCs. Up to now the TC/SC secretaries are in touch with the BIML only; for us it is not clear, how the communication will be between the secretaries, the BIML and the TMC in the future. We anticipate a decrease in the efficiency of technical work, if there is one more committee (the TMC) involved without a crystal clear definition of its role and work. For instance, on page 10/29 (clean version) it is said that one of the tasks of the TMC is to confirm the result of CIML votes on Final Draft publications. It is not clear, how this fits into the procedure described later in the draft (e.g. in chapters 6.5 and 6.6 and the Annexes), and what the benefits are. Once the CIML members have voted with sufficient majority the draft will become a Final Draft etc., but the TMC is not mentioned at all in the entire procedure up to now. (ii) In addition we suggest to describe the composition of the TMC in chapter 3.5, i.e. to move the content of chapter 4.1 to 3.5. (iii) In chapter 4.1 (which we recommend to be moved to 3.5) it is said that the	The TMC was re-introduced to deal with concerns expressed at the last CIML Meeting about the accountability of the management of the technical work by a committee appointed by the President. It simply formalises the current arrangements. In any case, this subject will be discussed at the CIML Meeting. The "confirming the result of CIML votes" was added due to a request for "due process". Others have previously commented that it is unnecessary. The composition and appointment of the TMC will be discussed at the CIML Meeting.

		members of the TMC be proposed by the CIML President. Why only by the President? We would prefer to add other possibilities to propose TMC members, e.g. the CIML members themselves or the BIML Director or even TC secretariats should be given the right to make proposals.	
3.5	Netherlands	Details of the TMC's operation can be found in 4 of these Directives. Details of the TMC's composition and operation can be found in chapter 4 .	OK
3.5, 3.7 (2x)	Netherlands	...these Directives. Delete when reference is made to a clause or chapter in the same publication E.g. in 3.5 change "Details of the TMC's operation can be found in 4 of these Directives." to "Details of the TMC's operation can be found in in chapter 4.	I agree this is simpler. There is no use of "chapter", "section", "clause" etc. to avoid problems of specific use of this terminology. This will be reviewed in the interests of clarity.
3.5	Netherlands	Suggest to amend following bullets, since there is some mutual relationship: "■ Providing long-term programming of OIML technical work – identifies and manages project priorities; ■ Approving technical work projects, whether these are for new publications or to revise existing ones; ■ Establishing and disbanding TCs;" "■ Providing long-term programm of OIML technical work – identifies and manages project priorities; (programm to be confirmed by CIML) ■ Approving technical work projects, whether these are for new publications or to revise existing ones; using long-term programm as reference ■ Establishing TCs following the procedure in 5.1 and disbanding TCs as result of procedure in 5.11 (clean version);"	OK, this would allay some Members' fears about the CIML's loss of responsibility, since it would make it clearer where approval or confirmation is required.
3.5	Netherlands	■ Establishing Terms of Reference (ToR) and work programmes for TCs;" At present the yearly work programmes of TC's are provided by the TC secretariats to BIML and discussed at the presidential council. We do not assume that it is the intention that the TMC will produce the ToRs nor the work programs in future. This	Under the current system, it is not quite the Presidential Council that discusses the TCs' work programmes, but a smaller group drawn from the Presidential Council. The intention was was that the TCs prepare their work

		<p>assumption is supported by the second bullet of 3.7 :</p> <p>“■ Preparing the terms of reference and the work program for approval by the TMC.”</p> <p>For the reason mentioned and in line with 3.7 2nd bullet we suggest to change 3.5 the 3rd bullet to :</p> <p>“ ■ Approve Terms of Reference (ToR) and work programmes for TCs;”</p>	<p>programme, which is then approved by the TMC, which itself is accountable to the CIML, thus making the process more transparent and accountable. The wording will be reviewed.</p>
3.5, first five bullets	US	<p>We feel that the CIML should be responsible for these activities, and not the TMC.</p>	<p>The management of the work will be discussed at the CIML Meeting. However, one of the objectives of this revision, from the outset has been to have decisions taken at the lowest appropriate level. Currently project reviews are undertaken by a meeting of some Presidential Council members. The intention of the TMC was to provide a more accountable means of management, without spending time at the CIML Meeting discussing details at the CIML Meeting. A report from the TMC on all technical activities still needs CIML approval under 4.2.</p>
3.5, eighth bullet	US	<p>What does this mean?</p>	<p>This was introduced in response to a comment on a previous draft that someone needed to physically confirm the result of voting in the interests of due process.</p>
3.6	Serbia	<p>Amend to read “Providing reports yearly to the TMC on progress and issues in the TCs;”.</p>	<p>Can be reviewed in the light of CIML discussions on the TMC. The intention was that these reports may need to be more than once a year. Once per year could be set as a minimum.</p>
3.6, second bullet	US	<p>The role of the BIML “contact person” needs to be better-defined, especially concerning the type of support to be provided. We feel that this support should</p>	<p>Agreed. Text will be added to explain this in more detail.</p>

		include attendance at TC/SC meetings to make sure that the Directives and other procedures are being properly followed.	
3.6, third bullet	US	The role of the BIML in “setting up” the TC pages on the OIML web site needs to be better-defined. The BIML should help develop the content on the site concerning online dissemination of drafts and commenting/voting.	Agreed as part of the above.
3.6, fourth bullet	US	We agree that the BIML should have the primary responsibility concerning membership lists. The web site should also make it easier for membership on TCs/SCs to be updated online.	-
3.6, fifth bullet	US	While we agree that the BIML should have this responsibility, we feel that this is also an important role for TC and SC Secretariats (keeping the current TC/SC structure).	This is not currently done by TCs, however good an idea it would be for them to do so. The BIML is ideally placed to undertake this task across all TCs (and SCs under the current structure).
3.6, ninth bullet	US	What does this mean?	It means that the BIML is responsible for setting up and running the CIML voting process. Once the vote has been closed, the BIML will send the results to TMC members so that they can “confirm the result” in the terms of 3.5 eighth bullet or decide what to do if the vote is inconclusive.
3.6, sixteenth bullet	US	We suggest that reports be provided quarterly.	This was deliberately left open to allow flexibility. There seems little point in having to make a report if nothing has happened in a quarter. However, this can be considered as part of the CIML’s discussion on the management of the technical work. See also comment from Serbia.
3.7, 5 TCs	Germany	According to our remarks under 1.1 we do not find a deliberate, convincing description of a flat structure of (many) new TCs and their tasks. We repeat that we do no longer support this proposal and rather prefer to keep the existing TC/SC structure and tasks.	See previous response.

3.7 General	US	<i>[BIML Note: See comment beginning “We oppose the proposal...” under “Structure of the technical work” above.]</i>	-
3.7, second bullet	US	We feel that the approval should be by the CIML and not the TMC (modify Annex A.1 accordingly).	See response above to US comment on “3.5 first five bullets”.
3.7, third bullet	US	Change 5.3 to 5.4	OK
3.7, fifth bullet	US	What are “TC liaisons”? Is this a BIML responsibility (see 3.6)? Please elaborate.	TC liaisons are those relevant directly to the TC’s work (e.g. individual ISO TCs). The OIML liaisons in 3.6 are those of a more general nature (e.g. ISO Central Secretariat). This could be made clearer in a terminology section.
3.7, eighth bullet	US	This is the first mention of “P-members”. Either define P-members here, put it in a Terminology clause, or cross-reference to 5.2. Also, add “... by asking for comments <u>from O-members and comments</u> and votes (from P-members) ...” (and define “O-members” as well).	See previous comments about a terminology section and/or cross-referencing.
3.7, fourteenth bullet	US	Move this entry to 3.6 and make it primarily the BIML’s responsibility.	I agree that this will have to become a BIML responsibility if we move to an IT-based project management system.
3.7, fifteenth bullet	US	This argues for keeping the current TC/SC structure.	It argues for permanent TCs, as foreseen in this draft (and in the current system). Under the current system it would not be appropriate for TCs to answer detailed questions relating to publications produced by “their” SCs.
4	Netherlands	(TM) in title change to (TMC)	OK
4.1	Netherlands	“.... TMC shall consist of no more than six CIML members.” We consider e.g. 2 members insufficient. add an : “at least” number of 4 and set the maximum on 8.	See US comment on this section below.
4.1	Serbia	Amend to read “The composition shall be reviewed at CIML Meeting every two	This can be considered as part of the CIML’s

		years”.	discussions on the management of the technical work.
4.1	Spain	For me it seems to be clear that President of CIML is not a member of TMC (just propose the TMC members), We think it is what is written but in our opinion President of CIML should be the President of TMC too.	It’s true that as written the President need not be on the TMC. This can be considered as part of the CIML’s discussions on the management of the technical work.
4.1	Switzerland	I suggest to introduce a regulation on the maximum length for the mandate of the TMC members. I suggest to strongly encourage the TMC member to attend the training course for secretariat.	This can be considered as part of the CIML’s discussions on the management of the technical work, but CIML Members whose countries have many secretariats may feel that they need to be on the TMC. I agree about the training.
4.1	US	Change “six” to “five” or “seven” so as to have an odd number of voting members (for making decisions in 4.3).	Agreed.
4.2	Netherlands	“...but shall meet least once a year to carry out...” add “at” before “least”	OK
5.1	US	We feel that new TCs can be proposed by the TMC but should be “established” by the CIML, as is done now. (See 3.7, second bullet, and Annex A.1)	It was intended that the TMC establishes the TCs, and that this is part of a concise but detailed report on all technical activities which is considered and approved (naturally with modification if necessary) by the CIML.
5.1.1	Netherlands	Since TMC approves projects it should not initiate proposals: Also rather conflicting with 3.5 top-line “ It does not develop projects, but..” delete ...”or the TMC...”	Agreed. Any CIML Member who is on the TMC can send proposals in any case.
5.1.1	US	Delete “the BIML or”.	Why? The BIML can currently make project proposals (3.2.1.1 and 2.6.1 of the 1993 Directives).
5.1.5	Netherlands	...he/she... change to “..it..” (2x)	OK

5.1.5	Spain	Revise the wording he/she now it is not appropriate.	OK
5.1.5	US	Change “he/she” to “it” in both places.	OK
5.1.5	US	Approval of a Project, establishment of a TC/SC, and initial allocation of a Secretariat must be the responsibility of the CIML and not of the TMC.	See response above to US comment on “3.5 first five bullets”.
5.1.8	US	<i>[BIML Note: See comment on information system under “General above.”]</i>	-
5.2	Netherlands	subchapter numbering “composition” is deleted in clean version	OK – will be corrected.
5.2	US	We believe that “ Composition ” is intended to be a separate (next) clause? This has created a numbering inconsistency between the “clean version” and the “marked version” of this draft. Please note that all of our comments for the remainder of Chapter 5 are referenced to the clause numbering in the “clean version.”	Agreed – sorry for the confusion.
5.2, fourth bullet (clean version)	US	The role of the BIML on TCs should be better-defined. We feel that the “BIML contact person” should be more than just a contact person, and should attend meetings, monitor the work, make sure that the rules are followed, etc. We see this as an important, core role of the BIML.	Agreed. Text will be added to explain this in more detail (in conjunction with US comment under 3.6 fifth bullet).
5.3 (clean version)	US	<i>[BIML Note : See comment beginning “We understand that ...” under “Structure of the technical work” above.]</i>	-
5.4 Note (clean version)	US	Remove “the” before “possible”.	OK
		Also, replace “TMC” with “CIML”.	This depends upon the outcome of CIML discussions on the management of the work.
5.6 (clean version)	US	Meetings must be coordinated with other TCs that cover similar topics. This argues for keeping the current TC/SC structure.	In practice there are very few meetings in any case, and very little to coordinate. If we introduce an IT-based project management system, then the BIML would coordinate calendars, which would in any case be public.

5.7.1 (clean version)	Netherlands	... Final Draft if it supported... ... Final Draft if it is supported...	OK
5.7.1 (clean version)	US	<p>This clause is confusing and needs to be clarified.</p> <ul style="list-style-type: none"> • The concept of a “quorum” of P-members needs to be added. • This clause does not say anything about how decisions are to be made at a meeting if there is not a quorum, or if there is a quorum but the requisite number of affirmative votes are not obtained. 	<p>For decisions other than the approval of a CD, there no change to the current system here - there is no quorum. 2.10 of the 1993 Directives states that decisions of a TC/SC require “<i>a majority of all registered P-members, when proposed at a meeting</i>”. In other words if there are 11 P-members but only 5 of them are present at the meeting, no decisions can be taken. If there are 6 present, decisions can be taken but all P-members at the meeting must agree. See also below.</p>
5.7.2 (clean version)	US	<p>While we support the provisions of this clause, it should be noted that “Abstentions and failures to reply are not considered as votes cast” is a significant change from the current (1993) Directives.</p> <p><u>This new voting rule may potentially speed up the voting/approval process considerably. However, it could also allow only a very small number of P-members to approve a document at the TC/SC level.</u></p> <p><u>This significant change should be carefully considered by CIML members.</u></p> <p>Note that keeping this new voting rule also argues in favor of keeping the Preliminary Ballot at the CIML level (see our comment to 6.6), since possibly only a very few number of CIML members will have seen a document prior to that time.</p>	<p>Again, there is no change here for decisions other than approval of a CD. 2.10 of the 1993 Directives states that decisions of a TC/SC require “<i>a majority of all votes cast, when proposed by postal ballot; abstentions, blank or unreadable votes and failures to reply to a call for votes do not constitute votes cast</i>”. This case applies to the cases where a secretariat ballots its TC members on specific issues, or where a TC meeting has been unable to make decisions due to poor attendance.</p> <p>You are right that since the provisions of 3.4.4 of the 1993 Directives have been removed, it is possible for a small number of P-members to approve a CD at or outside of a meeting, and I understand your concerns. This could be considered when the CIML discussed management of the work.</p>

5.9 (clean version)	US	Change “should” to “shall” (see 6.4).	<i>[should be comment on 5.8 second bullet]</i> OK
5.10 (clean version)	US	We find this numbering system to be confusing. “N” is not defined anywhere? Also, what is the document designation and what is the Committee designation?	<i>[should be comment on 5.10].</i> There is no change from Annex C of the 1993 Directives. The N is simply there to prefix the sequential number y, as explained in 5.10. I’m not sure I understand the rest of the comment, but as an example, the tenth document issued by the TC responsible for R 76 would have the number: OIML TC R 76/N 10 i.e., in the terms used in 5.10, $p=R$, $x=76$ and $y=10$.
5.11.1(clean version); 6.9	Netherlands	One could wonder whether recommendation of withdrawal of a publication is still within the scope of the TC. This clause was copied from the 1993 directives in which the TC had the responsibility for the periodic review. In the draft this responsibility is moved to BIML. In the present draft the sequence described is the following: When 6.9 (Review organised by BIML) results in the decision:”..should be Withdrawn” the TC secretariat shall report to BIML (5.11.1)(<i>although BIML has done the enquiry</i>). BIML shall report to TMC. TMC shall decide for withdrawal on basis of votes (6.9) BIML shall propose withdrawal at next CIML meeting. If CIML confirms (5.11.1) BIML shall let TC members know that TC is disbanded. 5.11.1 needs modification for unambiguity reasons. Suggest to amend first 2 sentences to: If, on basis of the periodic review (6.9), the TMC decides to recommend withdrawal of a publication for which the TC is responsible, the TMC shall propose the withdrawal at the next CIML meeting.	Agreed. This needs to be amended in the light of the CIML discussion on the management of the technical work.
5.11.1 and 5.11.2	US	If a TC is disbanded, then the ‘corporate memory’ associated with that TC could be lost. We feel that this is another	There is no intention of disbanding TCs unless these sections apply. If a

		argument for keeping the current TC/SC structure.	Recommendation has been withdrawn, there is no need for the OIML to provide support, so no need for any “corporate memory”. Similarly, if it is decided that a project is no longer needed before it reaches the publication stage, there is no need for its TC, or any “corporate memory”.
6	Germany	Based on (a few) respective negative experiences in the past we request - in compliance with ISO/IEC technical rules - to add in both chapters 6.3 and 6.4 (in an appropriate place) that all comments received shall be compiled and distributed to all TC members, together with the documented response (or action taken) by the secretariat, and the documented justification for that.	Agreed. Following comments made at the 2010 ISO DEVCO meeting, I think it would also be a good idea to insist that the comments and responses are distributed quickly and before work on the next CD is begun, with a short period allowed for the TC’s members to comment on inaccuracies.
6.1, last sentence	US	What does “... may need to be adapted” mean? The Directives should include all necessary procedures.	This is here to allow for flexibility in the procedures since, for example, Basic publications are quite varied in nature. It could be removed if the publication categories are reviewed.
6.1.2	Spain	The third and forth bullet are not in the Annex B1 format it would be helpful if all information required appears in annex B1.	Agreed
6.4.1 and 6.4.2	US	The materials distributed to TC/SC members should also include the reports of any voting.	Agreed
6.5, sentence after second bullet	US	This seems to be inconsistent with 6.4.4, since there is nothing said about the BIML first considering the advice given by the TMC (per 6.4.4) before registering and publishing the “Final Draft” in the case where 6.4.4 is applicable.	Agreed. In response to a comment from Canada on the last draft, I removed part of what is now 6.4.4, but did not amend 6.5. I will review the wording.
6.6	US	<i>[BIML Note: See comment under “Single CIML approval” procedure above.]</i>	-
6.6.2, final paragraph	US	Reword to: “If the publication is not approved, the CIML shall provide instruction as to what action should be taken.”	Agreed

6.6.5, 6.6.6	Spain	6.6.5. and 6.6.6.- In our opinion Guides and Publications developed by other bodies other than OIML should be approved by CIML.	This can be considered as part of the CIML's discussion about the TMC.
6.6.5	US	Interchange the second and third sentences.	Agreed
6.6.6	US	Add a sentence at the end "No joint publication arrangement may be established where the likelihood of conflicting review cycles exists."	Agreed on the principle. I would like to consider the wording further.
Annex A.1	US	We disagree with several of these entries (see our comments to other related clauses). For example: <ul style="list-style-type: none"> We feel that it is not appropriate for the BIML to propose a Project, only the CIML Members or the TMC should be allowed to do this; Insert a rectangular box under "Project proposal accepted" containing "Consult with CIML" (see 3.7 and 5.1) 	See US comment on 5.1.1 above. The BIML might typically suggest a project for a Basic publication or a Guide. I agree about the box.
Annex A.2	Spain	In 6.4 it is said that the first CD is distributed just for comments and not for voting but in de flow chart in the Annex, the first CD is also distributed for voting.	Agreed
Annex A.2	US	<ul style="list-style-type: none"> Need a separate feedback loop to treat 1 CDs, since there is no voting on 1 CDs; Need to augment treatment between "Secretariat considers no better agreement possible" and "Secretariat prepares Final Draft" to incorporate provisions of 6.4.4 (see also 6.5.5) 	Agreed See US comment on 6.5 above.
Annex A.4	Poland	Annex A.4 is missing	It is missing because the same procedure as A.3 applies. Annex A.3 is now "CIML approval of OIML publications" and I simply forgot to alter the index of Annex A.
	Switzerland	Is missing?	See Poland's comment
Annex A.4	US	Where is this?	See Poland's comment
Annex A.5	Poland	Annex A.5 contains references to nonexistent sections of the document.	This will be reviewed and corrected. See US comment below.
	US	<ul style="list-style-type: none"> References to 5.x.x should be to 6.x.x throughout 	Agreed

		<ul style="list-style-type: none"> What is the box containing a check-mark? 	<p>It refers to the “Approval by CIML President needed?” item on the left. Since it is now the only category where this is the case, this could be changed for clarity.</p>
Annex B.1	US	Modify 6 to include TCs and SCs	<p>This is dependant upon the outcome of CIML discussions on the structure of the technical work.</p>