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Dear Sirs,

Simplification of 8 Directives on measuring instruments

Introduction

The EU Commission has invited comments regarding the simplification of 8 Directives on measuring instruments. The consultee is an IT engineer who has been granted the status “Eur Ing” by FEANI (Fédération Européenne d'Associations Nationales d'Ingénieurs) and is also a part time physics and maths private tutor to 17 and 18 year-old (United Kingdom “A” Level) students.

Answers to Questions

Question 1 – The consultee believes that Option 3 provides the best solution as it ensures a consistent approach to instruments that are within its scope. Moreover, Option 3 ensures that the human interface of all the instruments within its scope have the same “look and feel” which simplifies the legislation while giving a better specification for the instruments concerned.

Question 2 – Technological progress is best served by publishing the “business requirements” of the measuring device rather than the technological details. For example, the directive should concentrate on the accuracy requirements of each instrument, but group the display requirements into a single section. In contrast, the current directive on the measurement of tyre pressures devotes a large amount of details of the construction of the dial but makes no mention of digital displays. The details relating to the dial construction apply equally to any instrument that uses a dial, not just tyre pressure gauges.

Questions 3, 4 and 5 – No comment

Question 6 – Directive 2004/22/EC, Annex 1, Section 7 makes reference to the “user”. In the view of the consultee, this section should be expanded as some users such as employees can be trained in the use of the instrument concerned, while others, such as members of the general public, do not receive any training. This is discussed more fully in Question 9.

Questions 7 and 8 – No comment

Question 9 – The consultee believes that Directive 2004/22/EC, Annex 1, Sections 7 and 10 should differentiate between users of an instrument who can reasonably be expected to have had training and those, such as members of the general public, who would not have had training. Instruments used by the general public include fuel pumps and tyre inflators.

The consultee suggests that if a member of the **general public** is required to use an instrument covered by the directive, then:

1. It should not be assumed that the user can read the national language. Text other than individual commands such as “Push”, “Stop”, and “Cancel” should be in the national language together with English, French and German.
2. It may reasonably be assumed that a user from another member state has used similar equipment in their host country even if he cannot read the language of the host country.
3. It should not be assumed that the user is aware of conventions that are specific to a small number of member states. In particular, no measuring instrument covered by this directive should display a supplementary unit of measure (as defined by Directive 80/181/EEC) unless the principal unit of measure is displayed simultaneously.

Points to consider

1. The consultee acknowledges that many sophisticated instruments allow the user to toggle between units of measure – if such instruments are covered by the Directive, they should only be made available to users who have had the appropriate training, not members of the general public.
2. The Commission should test the wording of any new directive by considering the [fictitious] case of the driver of a vehicle entering the UK for the first time who has a minimal command of English and who needs to inflate his tyres to 200 kPa. The driver is used to seeing 2 bars and 200 kPa being used interchangeably in different countries. If he were to use a UK air pressure system that was displaying psi without displaying either kPa or bars and he was not aware of what psi was, he might reasonably inflate his tyres to 20 psi thinking that it was equivalent to 2 bars or 200 kPa whereas he should have inflated his tyres to 29 psi.

Yours sincerely

Martin Vlietstra