

**Key issues concerning the simplification of 8 Directives
on measuring instruments
Stakeholder consultation**

**Comments and Answers
of the Czech Office for Standards, Metrology and Testing
and the Czech Metrology Institute**

Stakeholders are requested to answer the following questions:

1. What are their views on each of the three options in the light of the issues mentioned in the **following chapters**? Stakeholders are invited to present any other options that they would deem desirable.

View of the Czech Republic about the Need for Regulation per Sector

| | Repeal | Regulate | Comment |
|--|---------------|-----------------|---|
| Cold water meters Dir 75/33 | | X | |
| Alcohol meters Dir 76/765 | | X* | recommended to include oscillatory hydrometers; * manufacturers prefer maintaining the current state (old approach directive and the respective national regulation) |
| Alcohol tables Dir 76/766 | | X | |
| Medium accuracy weights Dir 71/317 | | X | recommended to implement specific requirements reflecting OIML R111 |
| Above medium accuracy weights Dir 74/148 | | X | recommended to reduce the scope for weights class F2 and lower classes and include specific requirements reflecting the OIML R111 |
| Tyre pressure gauges for motor vehicles Dir 86/217 | | X | |
| Standard mass of grain Dir 71/347 | | X | required to update the MID Annex by 1 l and ¼ l grain prover technical requirements |
| Calibration of ship tanks Dir 71/349 | | X | insignificant in CR |

2. What is the rhythm of **technological progress** and how would it be best served by each of the options? The Commission is seeking stakeholders' views on the sensitivity of each sector to technological progress and the option most preferred from the angle of adapting to technical progress.

| | Sensitivity to technological progress | Option preferred |
|-----------------------------|--|--|
| Cold water meters Dir 75/33 | low sensitivity | 3 (some manufacturers prefer option 1) |

| | | |
|--|--------------------|---|
| Alcohol meters Dir 76/765 | medium sensitivity | 3 1 - manufacturers |
| Alcohol tables Dir 76/766 | low sensitivity | 3 |
| Medium accuracy weights Dir 71/317 | low sensitivity | 3 |
| Above medium accuracy weights Dir 74/148 | low sensitivity | 3 |
| Tyre pressure gauges for motor vehicles Dir 86/217 | medium | 3 |
| Standard mass of grain Dir 71/347 | medium sensitivity | 3 (there are high meter construction requirements) |
| Calibration of ship tanks Dir 71/349 | low sensitivity | 3 |

3. What are the current **economic impacts** of the sectors and how would they change in respect of the options? (The Commission would like to receive as detailed as possible information on the numbers and types of instruments that are currently produced under the directives. Also it would be useful to get information about production, consumption, imports and exports of instruments falling under the directives as well as employment and estimates of the margins achieved. An important element is to understand what the effects could be of the various options on the sector in terms of the expected economic impacts.)

Cold water meters Dir 75/33

| | number of instruments produced | types | consumption | imports | exports | employment | estimates of the margins achieved |
|---------------|--------------------------------|-------|-------------|---------|------------|------------|-----------------------------------|
| Current state | tens | | | | negligible | negligible | |
| Option 1 | tens | | | | negligible | negligible | |
| Option 2 | tens | | | | negligible | negligible | |
| Option 3 | tens | | | | negligible | negligible | |

Alcohol meters Dir 76/765

| | number of instruments produced | types | consumption | imports | exports | employment | estimates of the margins achieved |
|---------------|---|-------|-------------|---------|---------|------------|-----------------------------------|
| Current state | 60 pcs/ year * *national legislation | 1 | | | | | |
| Option 1 | | | | | | | |
| Option 2 | | | | | | | |
| Option 3 | lower | | | | | | |

Medium accuracy weights Dir 71/317

| | number of instruments produced | types | consumption | imports | exports | employment | estimates of the margins achieved |
|---------------|--------------------------------|-----------------|-------------|---------|------------|------------|-----------------------------------|
| Current state | tens | 1 3 national | | | negligible | negligible | |
| Option 1 | tens | | | | negligible | negligible | |
| Option 2 | hundreds | | | | negligible | negligible | |
| Option 3 | hundreds | | | | negligible | negligible | |

Above medium accuracy weights Dir 74/148

| | number of instruments produced | types | consumption | imports | exports | employment | estimates of the margins achieved |
|---------------|--------------------------------|-----------------|-------------|---------|------------|------------|-----------------------------------|
| Current state | tens | 1 3 national | | | negligible | negligible | |
| Option 1 | tens | | | | negligible | negligible | |
| Option 2 | hundreds | | | | negligible | negligible | |
| Option 3 | Hundreds | | | | negligible | negligible | |

Tyre pressure gauges for motor vehicles Dir 86/217

| | number of instruments produced | types | consumption | imports | exports | employment | estimates of the margins achieved |
|---------------|--------------------------------|-----------------|-------------|---------|------------|------------|-----------------------------------|
| Current state | Hundreds | 2 3 national | | | negligible | negligible | |
| Option 1 | Hundreds | | | | negligible | negligible | |
| Option 2 | Hundreds | | | | negligible | negligible | |
| Option 3 | Hundreds | | | | negligible | negligible | |

Standard mass of grain Dir 71/347

| | number of instruments produced | types | consumption | imports | exports | employment | estimates of the margins achieved |
|---------------|--------------------------------|-------|-------------|---------|---------|------------|-----------------------------------|
| Current state | 0 | 0 | | | - | - | - |
| Option 1 | | | | | - | - | - |
| Option 2 | | | | | - | - | - |
| Option 3 | | | | | - | - | - |

| Calibration of ship tanks Dir 71/349 | | | | | | | |
|--------------------------------------|--------------------------------|-------|-------------|---------|---------|------------|-----------------------------------|
| | number of instruments produced | types | consumption | imports | exports | employment | estimates of the margins achieved |
| Current state | tens | | | | | | |
| Option 1 | tens | | | | | | |
| Option 2 | tens | | | | | | |
| Option 3 | tens | | | | | | |

4. Are there currently **economies of scale** and what are the expected effects of the various options on economies of scale? (Economies of scale can be achieved by opening up markets. A firm can benefit from selling the same product in different markets without requiring additional operations such as complying with differing regulations and repeating conformity assessment.)

| | Option 1 | Option 2 | Option 3 |
|--|----------|----------|----------|
| Cold water meters Dir 75/33 | low | low | low |
| Alcohol meters Dir 76/765 | medium | low | none |
| Alcohol tables Dir 76/766 | - | - | - |
| Medium accuracy weights Dir 71/317 | low | low | low |
| Above medium accuracy weights Dir 74/148 | low | low | low |
| Tyre pressure gauges for motor vehicles Dir 86/217 | none | none | none |
| Standard mass of grain Dir 71/347 | low | low | low |
| Calibration of ship tanks Dir 71/349 | low | low | low |

5. What is the current situation of **small and medium sized enterprises** and what is to be expected under the various options, also as regards the possibility to develop market niches and administrative burdens? In order to properly assess administrative burdens for small and medium sized enterprises, it would be necessary to know whether small and medium sized enterprises are currently producing to **national specifications** or to **harmonised specifications**.

| Situation of small and medium sized enterprises (incl. developing market niches, administrative burdens) | |
|--|--|
| Current state | Most meters are produced by small manufacturers, above all to national specifications |
| Option 1 | no change |
| Option 2 | no change |
| Option 3 | unified legislation and standards in EU, simplification of introducing products on the EU market, economic impacts not significant |

6. What the effects are of the various options on needs of **consumers and employees**? (Consumers may be the users of the instruments or may be directly subject to the measurement results. Similarly this may apply to employees.)

| Effects on needs of consumers and employees | |
|--|---|
| Current state | high level of consumer protection |
| Option 1 | no change |
| Option 2u | unacceptably low level of consumer protection in case of lack of the national specification |
| Option 3 | acceptable |

7. What are the **environmental effects** of the uses and how could they be influenced by the various options? (There could also be environmental effects related to the results of measurement or due to the use of the instruments.)

| Environmental effects | |
|------------------------------|------|
| Current state | none |
| Option 1 | none |
| Option 2 | none |
| Option 3 | none |

8. What are the needs of government and what are the effects of the options, notably also as regards **market surveillance**? (Governments might have specific needs in areas such as taxation, public health and safety for tasks which require legal metrological control by means of measurements performed by the instruments regulated. Can government carry out tasks equally well in the **absence of harmonised EU law**?)

| Needs of government, market surveillance | |
|---|---|
| Can government carry out tasks equally well in the absence of harmonised EU law? | |
| Current state | differences between national legislations of EU member states |
| Option 1 | no change |
| Option 2 | worse legislative background, higher burden for market surveillance |
| Option 3 | unified legislation and standards in EU, lower burden for market surveillance |

9. To provide **comments** on whether all issues and alternatives concerning the Directives concerned by the simplification have been highlighted in the above text.

| | Comments |
|-----------------------------|-----------------|
| Cold water meters Dir 75/33 | |
| Alcohol meters Dir 76/765 | |

| | |
|--|--|
| Alcohol tables Dir 76/766 | they should be extended for temperatures under zero degrees of Celsius |
| Medium accuracy weights Dir 71/317 | See the table under point 1 |
| Above medium accuracy weights Dir 74/148 | See the table under point 1 |
| Tyre pressure gauges for motor vehicles Dir 86/217 | |
| Standard mass of grain Dir 71/347 | The Commission Regulation 824/2000, establishing procedures for the taking-over of cereals by intervention agencies and laying down methods of analysis for determining the quality of cereals, should be taken into account. Absence of the definition of 1 l grain prover, eventually ¼ l grain prover. |
| Calibration of ship tanks Dir 71/349 | Absence of the definitions of inland water vessels and coasters. |

10. To indicate the **overall costs and benefits** that they expect to have as a result of any of alternative option.