

Dear Sir/Madam

Weights Directives:

As a calibration laboratory and a Trading Standards Service we offer calibration of weights and "stamping" of suitable weights for use for trade. Weights used for trade are covered by the Weights Regulations 1986. Very few EC verified weights, as per directive and within UK as per Measuring Instruments (EEC) Regulations 1988, are in use within the UK as traders seem to be more aware of the UK regulations and requirements and the familiar "crown stamp".

However as manufacturing techniques have improved and therefore the cost of weights reduced it makes more sense to use weights of higher class than currently in use. E.g. within a food factory stainless steel is better than cast iron but often these weights do not comply with the regulations and therefore cannot be stamped. The use of such weights could therefore be controlled via certification - many do this anyway as well as "stamping" as this is often a requirement of such as EFSIS and the trader's customers, e.g. Sainsbury's. EC verification of high accuracy weights causes issues in terms of suitability for use when marked.

We hold no weights bearing the EEC verification marks and therefore repeal would not affect us. We do however hold for weights and measures purposes and calibration purposes.

E1 - two sets

E2 - three sets

F1 - three sets

F2 - two sets

M1 - 25 sets.

These weights have been in use for varying lengths of time with some purchased more recently due to changing needs. However M1 weights have been in use for over 20 years and are still serviceable so long as they are cared for - they have been in use for this length of time as there has always been a need for these weights as they are classified as Working Standards weights within the Weights and Measure (Local & Working Standards Weights and Testing Equipment) Regs 1986. One set of F2 weights have been in use for over 60 years It is envisaged that F1, E2 and E1 weights will be in use indefinitely.

Any likely costs to us would be in any changes to the laws in relation to traceability.

Currently we have two sets of reference standards calibrated by a UKAS accredited calibration laboratory (although this could of course be any similarly accredited laboratory).

As most of our work is legal metrology there are issues over traceability of standards. For instance we hold E1 reference standards and therefore can calibrate all other classes of weights from E2 to M3. However for Local Standards that each Local Weights and Measures Authority holds (in effect these are Class F2) which are used in the calibration of working standards weights (in effect M1 class) these have to be calibrated by the National Weights and Measure Laboratory against the Tertiary Standards (in effect Class F1) held by the Secretary of State. This costs far more than we charge for similar UKAS calibrations, approximately twice as much whereas we could do it ourselves, but this would require changes to UK National legislation as well.

As we operate a calibration laboratory calibration costs of our own equipment are recovered by provision of services to businesses.

If there were a future requirement for calibration to class E1 as well there would be significant costs involved running into approximately £100k bracket.

We don't use medium accuracy weights but if we test them we test in accordance with the Weights Regulations 1986 - i.e. in use for trade specification - in effect Class M2 weights. For legal metrology work - that is work related to our statutory functions under the Weights and Measures Act e.g. testing shop scales - we apply those standards specified by NWML and within the regulations (mentioned above). The specification for these weights is found at <http://www.nwml.gov.uk/Docs/Enforcement/7000%20series/7120.pdf> (working standards) and the one for Local Standards has recently changed to <http://www.nwml.gov.uk/Docs/Enforcement/7000%20series/SWM%207110%20Feb%2008.pdf> (a bit more in line with OIML spec)

For all weights we calibrate for our customers we use the OIML Specification R111 - this is used as a basis for permissible errors and the quoted uncertainty is generally reported as a fraction of this permissible error.

It is fair to say the weights directive is rarely referred to except it is referred to within the NAWI Regulations 2000 (regulation 11)

Local Standards and Working Standards and Test Weights can only be held by a Local Weights and Measures Authority, and whilst they are class F2 and M1 respectively in terms of permissible errors their construction differs for M1 to that in the weights directive. Additionally the Weights regulations prohibit some markings on weights but the Weights directive permits them so there are ways round national legislation which isn't ideal.

There is also some confusion over certain classes of weights now as OIML R11 was revised and some permissible errors changed and these no longer tie up with the Weights Directive nor National regulations. Thus one directive/standard would clarify the situation for all.

Tyre pressure gauges (TPG):

Interesting to note the vote on this one, and I feel that this is due to the potential impact it has on road safety and the environment. I myself had a problem with my car and found it to be a tyre pressure gauge on a forecourt at fault (reading inaccurately by -6 PSI so my tyres were much harder than they should have been), however it was a preset type - these are now very common.

I consider that there should be stricter controls on these in the interests of public safety with regular inspection a requirement. We currently undertake this as a Trading Standards Service when we inspect petrol stations for accuracy of fuel dispensers. We have had a number of issues over the years with tyre pressure gauges and their accuracy/safety.

Indeed I consider that the directive should go as far as to include all TPG, including those for sale at retail level. Currently a British Standard covers these but many are imported and do not comply with any accuracy standards. Clarity on what standards they should comply with be beneficial - especially international standards alone.

We must consider that incorrect tyre pressures has a detrimental impact on road safety and fuel economy both of which have a major impact on global warming etc.

As for the remaining directives we have not been involved in these as far as I am aware, at least not in my time here.

If you require any further information please contact me.

Yours faithfully

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Kind regards

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