

Romanian Position on Commission Staff Working Document “Key Issues concerning the simplification of 8 directives on measuring instruments”

After analyzing the above mentioned document issued by the European Commission and the current national situation, we consider that the most suitable solution for Romania is option 2 (repealing the 8 directives).

We base our option mainly on the insignificant effect of the areas regulated by the 8 directives on the Romanian stakeholders, taking into consideration the number of existing measuring instruments of this type on the market, as well as the number of Romanian manufacturers.

We believe that option 2 is cost and time saving for all stakeholders involved (manufacturers, regulatory authorities). So, if the manufacturers may continue to use their own national regulations which have similar technical international requirements, they will not have to invest any money in new conformity assessment procedures (involving notified bodies).

We do not have complaints regarding the implementation of these directives; as regards the technical issues, we believe that technological progress could impose some updates only for the measuring instruments regulated by Directives 75/33/EEC, 86/217/EEC, 71/347/EEC and 71/349/EEC. We think that the necessary legislative amendments can be performed by national authorities easier and faster than at the Community level. In conclusion, we maintain our position expressed in the Working Group which took place in April 2007, sustaining that repealing the 8 directives is a good solution as the free movement of the measuring instruments can be assured by applying the mutual recognition principle.

The “market surveillance” for these measuring instruments would take place only in the case of option 3. For option 2, the existing legal metrological control mechanisms regarding the placing on the market and putting into use of the measuring instruments concerned, which we consider satisfactory in this stage, will be maintained at national level.