

## Metrology

These comments are submitted on behalf of Trading Standards East Midlands [TSEM] in England. TSEM are a Regional group comprising representatives from the 8 Local Weights & Measures Authorities of Northamptonshire, Leicestershire, Leicester City, Lincolnshire, Nottinghamshire, Nottingham City, Derbyshire and Derby City.

All 8 Authorities have responsibility for the local enforcement of legal metrology requirements and 5 are also Notified Bodies under both the Non-automatic Weighing Instruments and the Measuring Instrument Directives

Thank you for inviting us to give a response to the European Commission Consultation on the future of the 8 “old approach” Directives remaining under the framework directive 71/316/EEC, which are under review.

It is our opinion that these 8 Old approach Directives are no longer required and that their demise will enhance the coherence of the legal framework for legal metrology for the future.

We believe that [Option 2](#) of The Commissions stakeholder consultation ‘key issues’ document dated 21<sup>st</sup> May 2008 is preferable for 6 of the 8 Directives since it maintains International Standards as the basis of National State Regulation, should that be desired.

However for 2 of the 8 Directives we believe [Option 3](#) may be preferable: Directive **71/317/EEC** on medium accuracy bar weights & cylindrical weights, and Directive No. **74/148/EEC** on above-medium accuracy weights.

In these 2 cases we believe the creation of a “New Approach” Directive for such weights would add value to reference/reliance to OIML R111 alone because a New Approach Directive can incorporate criteria for a verification mark which would have validity across Member States. As enforcers of UK & EU legal metrology requirements for weights in prescribed circumstances we have traditionally seen verification marks stamped on weights as desirable to both ourselves and the business operator.

We also recognise that many manufacturers/suppliers of weighing equipment and weights today are pan-European businesses; if Member States have their own National Regulation (albeit based on R111) of weights (as per Option 2) we believe an opportunity for consistency and efficiency afforded by Option 3 would be missed.

*Angus Mackay  
Northamptonshire County Council Trading Standards Service  
Northampton. NN4 0GB. England*

*14<sup>th</sup> July 2008*

[amackay@northamptonshire.gov.uk](mailto:amackay@northamptonshire.gov.uk)