



10th of July, 2008

Subject:

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

All the following relates to Alcohol meters Dir 76/765 and Alcohol tables Dir 76/766:

1. Definition of the issue and possible options

We propose **Option 3** as alcoholic strength measurement is the basis for taxation of alcoholic solutions (beverages) in many Member States.

2. Technological progress

Alcoholic strength measurement today is virtually exclusively based on oscillation-type density meters according to EN ISO 15212. We therefore propose to include these density meters into the corresponding directive or harmonizing legislation.

3. Impact assessment

Several 10,000 units of oscillation-type density meters are currently in use within the Member States, of which a large number is used for alcoholic strength determination.

4. Economies of scale

Option 3 allows the production and distribution of standardized instruments for all Member States and therefore leads to a reduction of costs for both producers and consumers.

5. Small and medium-sized enterprises

Measuring instruments are traditionally produced by small to medium-sized companies which would largely benefit from **Option 3**.

6. Effects on consumers and employees

Consumers may benefit from a reduction of costs and, at the same time, improvement of quality of the measured products. Employees will benefit from better working conditions due to possible automation and corresponding elimination of routine burden and less exposure to air contaminated with alcohol vapour by applying oscillation-type density meters according to EN ISO 15212.

7. Environmental effect

Oscillation-type density meters according to EN ISO 15212 require much lower sample volumes than traditional methods according to OIML recommendation 44. Therefore, transportation, storage and disposal requirements for samples are substantially decreased.

8. Government needs

Government needs agree with what is outlined under points 6. and 7.