

Key issues concerning the
simplification of 8 Directives on
measuring instruments

European Commission
Stakeholder Consultation 2008

Response of
The Trading Standards Institute

July 2008



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Dear Sirs

Thank you for the opportunity to submit our comments on the future of the eight 'Old Approach' legal metrology Directives.

The Trading Standards Institute is the United Kingdom's professional body for Trading Standards professionals working in the private and public sectors.

It is the UK national body responsible for representing, supporting, lobbying, and championing Trading Standards to a range of stakeholders including government, business, consumers, and the media.

We look to provide innovative solutions across the regulatory arena; to administer and award professional qualifications; to accredit and certify training and ensure the ongoing competence of members; and to influence and lobby on behalf of the profession as a whole.

We aim, through our actions and our members' actions, to empower consumers and reputable business to contribute to a vibrant economy.

We strive to eliminate rogue traders and unfair trading practices from the marketplace, to promote environmental sustainability, and to make an effective contribution to the health and social wellbeing of citizens and communities.

In compiling this response, TSI has sought the view of our joint Lead Officers on Legal Metrology, Gerry Dutton and Louise Coben-Gipps. If you require clarification on any of the points raised in the response, please do not hesitate to contact Gerry and Louise at their joint email address lometrology@tsi.org.uk.

In conclusion, please note that TSI does not regard this response to be confidential and is happy for it to be published.

Yours faithfully

A handwritten signature in blue ink, appearing to be 'RG', with a large, stylized flourish at the end.

Ron Gainsford
Chief Executive

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Trading Standards Institute Response

The Commission consultation is relevant to the following existing UK statutory instruments:-

The Calibration of Tanks and Vessels (EEC Requirements) Regulations 1975 (S.I. 1975 / 2125), implementing Directive 71/349/EEC on the calibration of tanks of vessels;

The Alcoholmeters and Alcohol Hydrometers (EEC Requirements) Regulations 1977 (S.I. 1977 / 1753), implementing Directive 76/765/EEC on alcoholmeters and alcohol hydrometers;

and

Council Directive 71/347/EEC of 12 October 1971 on the approximation of the laws of the Member States relating to the measuring of the standard mass per storage volume of grain.

We suggest these directives are now superfluous and could be revoked

and

- The Measuring Instruments (EEC Requirements) Regulations 1988 (S.I. 1988 / 186), implementing:
- Directive 71/317/EEC on medium accuracy bar weights and cylindrical weights;
- Directive 74/148/EEC on above-medium accuracy weights;
- Directive 75/33/EEC on cold-water meters (outside MID) ;
- Directive 86/217/EEC on tyre pressure gauges for motor vehicles.

We suggest these directives should be replaced by New approach Directives which would bring them in line with other current directives.

We also offer the following specific information about which members have expressed concern;

1. The Directive on Above Medium Accuracy Weights (Working Standard and Local Standards + NWML standards) and Medium Accuracy weights (Trade Weights)

This should be updated in the light of being behind the current guidance in OIML R111: 2004

This OIML recommendation is also very detailed in its requirements.

Principal differences to EC Directives:

It tightens up the tolerance on M2 Trade Weights.

Its scope covers weights up to 5 Tonne (previously max 50kg).

It has detailed requirements for magnetic properties of stainless steel used in high accuracy weights.

It has low accuracy M3 weights and new classes for large weights M2-3 & M1-2.

Many UKAS Accredited Mass Laboratories have to work to EC Directives for Legal Metrology and R111 for scientific requirements

2. Directive 86/217/EEC on tyre pressure gauges for motor vehicles.

Tyre pressure gauges are extremely important as a tool contributing to road safety. An inaccurate one can contribute to road traffic accidents and it is because of this that *it is our opinion that such equipment should be subject to metrological control.*

Trading Standards Institute – 14 July 2008