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Public consultation about simplifying eight legal metrology directives

The Austrian Federal Chamber of Labour represents three million employees and their families.

As part of the public consultation, we wish to respond as follows to the simplification of eight legal metrology directives:

Question 1:

Option 1: This option is no longer up-to-date, as the processes and requirements regarding the measuring instruments are already over 30 years old.

Option 2: As standard requirements (albeit optional) already exist for these measuring instruments, they should be abided by. This option, i.e. of shifting to national standards only, would be a step backward in the harmonization of requirements in Europe, which is the preferred approach.

Option 3: This option is the best approach, as the measuring instruments would then be covered by a modern, up-to-date directive, which includes all the advantages of the Measuring Instruments Directive and the New Approach.

Question 2:

There has been relatively little technological progress in recent years in the technology and requirements for the measuring devices in contrast to the measuring devices already included in the MID.

Option 3 promotes technological progress the most, as the basic principle in the MID is to have requirements that are neutral in terms of the technology employed.

Question 3: ---

Questions 4 and 5:

For manufacturers of measuring instruments requiring calibration who wish to market them in Europe, it is always easier to have a common framework and requirements in place for these measuring instruments. It is therefore better for small and medium sized enterprises if they can produce and market instruments for the entire European market to harmonized specifications. This is also a further argument for Option 3.

Question 6:

In cases where calibrated measuring instruments have to be used, consumers have a clearer overview if there are standard requirements in place for measuring instruments. In this approach, when it comes time for them to re-calibrate the instruments, they do not face country-specific (option 2) conditions or certifications or similar administrative hurdles that would make recalibration within a country more difficult. Option 3 guarantees that consumers can rely on a common level of protection (as regards mandatory calibration) in the various Member States of the EU.

Question 7: ---

Question 8:

It is administratively easier for government to have the same requirements in place throughout Europe for measuring instruments. This approach eliminates administrative tests on the equivalence of the level of protection and other procedures that would be necessary with Option 2. Option 3 therefore simplifies access to certified measuring instruments, which would then enter the market initially calibrated, as well as subsequent recalibration and market surveillance or the modification of the measuring devices in use.

Question 9: ---

Kind regards,



Herbert Tumpel
President



Maria Kubitschek
pp Director