

Convener replies to the comments submitted on the 1CD update of VIML
(21 June 2022)

I. Explanatory Note

1. The comments for the 1 CD update of VIML (V 1, 2013 edition) have been carefully studied. The colleagues who submitted comments are thanked for pointing out the issues that require redrafting.
2. When preparing the responses to the submitted comments, it was taken into account that the scope of update project as detailed in the project proposal approved by the CIML, i.e. this update relates only to the Annex of terms from ISO/IEC 17000. More significant changes, brought about by the revision of the VIM, will be handled in a separate revision project in the future.
3. In update, we intend - in accordance with the update rules - to change the contents of the VIML where the current text can be replaced with a new one, taken from the amended recommendation, document or standard. The update does not change the VIML layout, the entries list, or the entries structure.

The entries taken from the VIM 3 (OIML V 2-200:2012) remain unchanged for the time being (until the revised VIM 3 (VIM 4) is ready). However, wherever it is known that new definitions are being developed, we propose adding an explanatory text note (or footnote).

For example, the entry "SI" will be accompanied by such an explanation.

After publication of VIM 4, when the revision of VIML is started, the old entry "SI" will be replaced by a new one taken from VIM 4.

4. In the update text we introduced corrections of a proofreading nature.
5. Detailed responses to the submitted comments are provided in the attached table.

We suggest modifying texts of *Note 1* and *Note 3*, and adding the following Explanatory Note after the definition of the term 0.02:

Footnote: The definition of the SI is a quote from OIML V 2-200:2012. OIML V 2-200:2012 is currently under revision; this may result in a new definition of the SI. In 2019, there was a redefinition of the SI where all units, especially base units, are expressed in terms of defining constants.

II. Detailed responses

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0001 IR					There is no comment at this stage.		
0002 UK		4 (0.04)			"...reference quantity value" is mentioned, but the note mentions "reference value". This seem to imply that there is a difference.	Propose amending the text to "reference quantity value" in the note. "reference quantity value" is commonly used throughout the document, e.g. in clause 0.05, etc.	Noted. Any modification of this entry is outside of the scope of the update project.
0003 DE		7 (page 7)	last paragraph	Ed	Change "ISO/IEC 17020" into "ISO/IEC 17000"		Accepted. "ISO/IEC 17020" was changed to "ISO/IEC 17000:2020"
0004 DE		9 (page 9)	/0.02, note 1	Te	Change "...on the seven base quantities defined in terms of..." into "...on the seven base quantities and the base units are defined in terms of..." or "...on the seven base quantities and a set of seven defining constants..." as the base quantities are not defined in terms of constants. Please check the given reference again. The OIML V2 has to be deleted completely or it should be referred to the current version.		Noted. The proposed footnote to the entry 0.02: "The definition of the SI is a quote from OIML V 2-200:2012. OIML V 2-200:2012 is currently under revision; this may result in a new definition of the SI. In 2019, there was a redefinition of the SI where all units, especially base units, are expressed in terms of defining constants." The proposed modification of texts of <i>Note 1</i> and <i>Note 3</i> to the entry 0.02: <i>Note 1</i> : "The SI is founded on the seven base quantities defined in terms of a set of seven defining constants. See: OIML V 2-200:2012, 1.16 and the SI Brochure published by the Bureau International des Poids et Mesures (BIPM) and available on the BIPM website [BIPM 2019]." <i>Note 3</i> : "For a full description and explanation of the International System of Units, see the current

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							<p>edition of the SI Brochure [BIPM 2019].”</p> <p>In other words: The OIML V 2 <u>will be referred to the current version</u> as soon as the VIM 4 is ready. During the planned revision of VIML, not now.</p>
0005 DE		A.1, A.5		Ed/te	The referenced “annex A” is not available (probably part of ISO 17000?). We have to clarify if the referenced information is important for V1.		<p>Noted.</p> <p>Indeed, the Annex A, which is mentioned in the entry under discussion, is a part of the ISO/IEC 17000:2020 standard.</p> <p>As suggested the text of the <i>Note 1</i> and the <i>Note 2</i> to entry A.1, and the text of the <i>Note 3</i> to entry A.5 of Annex A of VIML will be modified so it read that: “... Annex A [ISO/IEC 17000:2020] ...”.</p> <p>Due to the fact that the 2013 CIML decision was that the VIML is to contain the terms related to the conformity assessment and that these terms would be selected from ISO/IEC 17000:2020 and quoted in the Annex A to VIML, we acknowledge the validity of the information contained in the said the standard. There is no reason for OIML to</p>

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							verify the validity of the information contained in ISO/IEC 17000:2020 entries, or to improve the entries by rejecting from them anything that is supposed to be less important. This would be, as it were, the creation of a "competitive", improved ISO/IEC 17000:2020 standard. If OIML wanted the entries in the standard to have a different wording, there was an opportunity (until not long ago) to propose it to the authors of the revised standard.
0006 DE		A.10	Note 4	ed	Reference is not valid, as annex A of ISO IEC 17000 was not taken over, How important is the information? Could it be transferred into the note?		<p>Noted.</p> <p>The reference is "valid". It informs where any further information related to the entry under discussion can be found. All the text of the standard is important. Not all of it should be quoted in the Annex of the VIML.</p> <p>A vocabulary is a collection of terms and definitions relating to a certain field, though sometimes they are derived from related fields. Terms in VIML come from, among others, various OIML publications. These terms are common to different areas of metrology or used in many areas. There is no reason <u>to broaden entries quoted from the standard</u> by quoting any other texts of the standard.</p> <p>The terms relating to the conformity assessment are taken from an international standard and are listed in Annex A to the VIML. The change caused be revision of the standard requires an update to VIML. OIML does not introduce its own (improved) terminology in this area. The reader of VIML may refer to the detailed OIML publications (OIML R and D) or to the standard for additional information related to terms contained therein.</p>

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0007 DE		A.11	Note 3		Reference is not valid, as annex A of ISO IEC 17000 was not taken over, How important is the information? Could it be transferred into the note?		Please see the response related to 0006.
0008 DE		A.13		Te	Add a note explaining that "peer assessment" within OIML has the same value than "accreditation" (A.19) or that the attested results are treated similar.		<p>Noted.</p> <p>The vocabulary defines terms. Interpretation of definitions usually is contained in an interpretation document(s) and rather not in the vocabulary itself.</p> <p>As for the statement that: "... peer assessment" within OIML has the same value than "accreditation" (A.19) or that the attested results are treated similar "- it may be confusing. In any case, it is hardly legible. "Having the same value within OIML" can be understood differently.</p> <p>"Peer assessment" and "accreditation" are two different concepts, both are explained in ISO/ IEC 17000 as 6.7 and 7.7 respectively. And OIML accepts these definitions.</p> <p>In some cases, "peer assessment" can be applied in the accreditation process. Besides it is, e.g., well known that: "The European co-operation for Accreditation (EA) is recognized by the European Commission to operate the peer-evaluation system of its Members, the National Accreditation Bodies (NAB), according to Article 14 of Regulation (EC). No 765/2008 'Setting out the requirements</p>

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							<p><i>for accreditation relating to the marketing of products and repealing Regulation (EEC) 339/93'.</i></p> <p>So it seems better not to introduce the modification.</p>
0009 DE		A.6		Te	Shall the OIML Recommendations be added explicitly as a note 3?		The author of the proposal is kindly invited to suggest a specific formulation of the postulated note. Such a note could be introduced as an Editor's Note since may not modify the entry quote from ISO/IEC 17000:2020.
0010 UK		A.6			Normative documents are mentioned in the note.	It will be good to promote OIML Recommendations where possible in the VIML. Propose adding OIML Recommendations to the note.	<p>Noted.</p> <p>Wording: "Add OIML Recommendations to the note." - is a bit unclear. Is it suggested to modify the entry quoted from the ISO/IEC 17000: 2020</p> <p>The author of the proposal is kindly invited to suggest a specific formulation of the postulated note.</p>
0011 DE		A.7		Ed	Keep the information about the changes in ISO IEC 17000, i.e. "[SOURCE: ISO 9000:2015...."?		<p>Noted.</p> <p>It is kept because it is a part of the entry in ISO/IEC 17000:2020.</p>
0012 DE		A.8		te	Shall "certification scheme" stay included even if "this term and its definition are not found in the ISO/IEC 17000:2020"? It is preferred to include the definitions used in B18 instead as the OIML certification system with its schemes is described there. Otherwise the entry should be deleted.		<p>Noted.</p> <p>The "certification scheme" will be removed during the revision of the VIML.</p> <p>The submitted draft of the committee is an update, not a revision, so if an entry has been deleted from ISO/IEC 17000:2020, then in the update of the VIML this term should remain with information about what happened to this entry.</p> <p>The term "certification scheme" should not be removed from Annex A of the VIML as it is often</p>

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							used by OIML G 21 „Guidance for defining the requirements for a certification system for prepackages”. It appears there 25 times. During the future VIML revision the term “certification scheme” will be placed of the body of the VIML with the definition accepted by OIML.
0013 FR		A.8		te	The status of the item “certification scheme” is not clear: it has been kept but without a definition because there is no definition for it in ISO/IEC 17000:2020. Shall this annex only contain definitions from the standard? Is the definition for “certification scheme” necessary?	If the definition is not required, to remove this item. If a definition is really required, to agree a suitable definition. If the annex shall only contain definitions from the standard ISO/IEC 17 000:2020, put the suitable definition in another place.	Noted. Please see the response related to 0012 and 0014. The submitted committee draft is an update, not a revision. Therefore, the new wording of the terms definitions and notes was inserted in the annex in the CD. Where ISO and IEC have dropped an entry, we left the term alone information, what happened to that entry. (We thought we could happen to be asked why the “certification scheme” was removed from the VIML.) The new VIML contents will be introduced on the occasion of its revision.
0014 UK		A.8			certification scheme this term and its definition are not found in the ISO/IEC 17000:2020	Proposal: agree a suitable definition or alternatively remove this item	The submitted committee draft is an update, not a revision. Therefore, the new wording of the terms definitions and notes was inserted in the annex in the CD. Where ISO and IEC have dropped an entry, we left the term alone information, what happened to that entry. In addition, the term “certification scheme” should not be removed from Annex A of the VIML as it is

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							often used by OIML G 21 „Guidance for defining the requirements for a certification system for prepackages”. It appears there 25 times. The new VIML contents will be introduced on the occasion of its revision.
0015 PT		Annex A		ge	The texts of the entries of the Annex A are equal to the texts of the entries quoted in ISO/IEC 17000:2020 but they do not refer to terms defined in the same Annex A or to terms defined in entries of the ISO/IEC 17000:2020. So, for the sake of the clarity, it would be better also to refer the entries defining the used terms. The proposed changes displayed in the next column, consisting on inserting references to other entries, like the entries of the ISO/IEC 17000:2020 do, apply to all the entries of the Annex A.	A.1 conformity assessment demonstration that specified requirements (A.6) are fulfilled Note 1 to entry: The process of conformity assessment as described in the functional approach in Annex A of the ISO/IEC 17000:2020 can have a negative outcome, i.e. demonstrating that the specified requirements are not fulfilled. Note 2 to entry: Conformity assessment includes activities defined elsewhere in this document, such as but not limited to testing (A.10), inspection (A.11), certification (A.18), and accreditation (A.19), or in other document, such as validation (ISO/IEC 17000:2020, 6.5) and verification (ISO/IEC 17000:2020, 6.6). Note 3 to entry: Conformity assessment is explained in Annex A of the ISO/IEC 17000:2020 as a series of functions. Activities contributing to any of these functions can be described as conformity assessment activities. Note 4 to entry: This document does not include a definition of “conformity”. “Conformity” does not feature in the definition of “conformity assessment”. Nor	Noted. Annex A to VIML contains the entry A1 which is an exact quotation from ISO/IEC 17000. It contains the following text: "... demonstration that specified requirements are fulfilled". If, while reading the above text, one would like to find out what the definition of "requirement" is, then he can look into the index at the end of the VIML and find that the definition of "requirement" is in entry (A.6). This is probably what the authors of the ISO/IEC 17000 standard thought. However, if we change the ISO/IEC definition and write "... demonstration that specified requirements (A.6) are fulfilled", this will mean that: - we correct the original text of the standard, - acting consistently throughout the whole VIML we will have to give at each term the information in parentheses where its definition is. This would be a new and a troublesome idea. It should also be borne in mind that the current wording of VIML and its layout (without providing each term with information where its definition is) was adopted by CIML 10 years ago and has never been questioned by anyone.

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						<p>does this document address the concept of compliance. [ISO/IEC 17000:2020, 4.1 modified]</p> <p>A.1 évaluation de la conformité démonstration que les exigences spécifiées (A.6) sont respectées Note 1 à l'article: Le processus d'évaluation de la conformité tel que décrit dans l'approche fonctionnelle de l'Annexe A de la ISO/IEC 17000:2020 peut aboutir à un résultat négatif, c'est-à-dire en démontrant que les exigences spécifiées ne sont pas respectées. Note 2 à l'article: L'évaluation de la conformité inclut des activités définies ailleurs dans le présent document, telles que, sans pour autant s'y limiter essai (A.10), inspection (A.11), certification (A.18), et accréditation (A.19), ou dans d'autre document, telles que validation (ISO/IEC 17000:2020, 6.5) et vérification (ISO/IEC 17000:2020, 6.6). Note 3 à l'article: L'évaluation de la conformité est expliquée à l'Annexe A de la ISO/IEC 17000:2020 par une suite de fonctions. Les activités contribuant à l'une de ces fonctions peuvent être décrites comme étant des activités d'évaluation de la conformité.</p>	<p>The only possible form of interfering with the text layout of Annex A to VIML may consist in adding cross-references (marked as "OIML explanation") in the content of Annex A, for further explaining the issues considered by the project group (PG) as requiring supplementation.</p>

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						Note 4 à l'article: Le présent document n'inclut pas de définition pour le terme « conformité ». Le terme « conformité » ne figure pas dans la définition du terme « évaluation de la conformité ». Le présent document n'aborde pas non plus le concept de « compliance ». [ISO/CEI 17000:2020, 4.1 modifié]	
0016 FR		Annex A		ed	In the introduction of the document, it is indicated the definitions have been updated according to the standard ISO/IEC 17000:2020. If these definitions are exactly the definitions available in this standard, we have no comment.		Noted and accepted.

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