

## Template for comments and convener's observations

Date:2025-05-13

Document: CEEMS\_P2\_N008

Project: CEEMS/p 2

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
0001 DE				ge	We have looked at the 1WD of the revision of D 19 and have no comments at that time.		Noted.
0002 IR					No comment		Noted.
0003 FR		1.2			Whatever is the type of procedure it should be recalled that the manufacturer is responsible for the conformity of the sample to the documentation and in case of recognition of tests the manufacturer is responsible to ensure that the tests provided have been made on the model that is to be approved		Noted. However, no proposal has been submitted so there is no change to text.
0004 BR		1.2	Model A Title	ge	I understand that the title isn't appropriate to the concept given about Model A.	I suggest substitute for "Model A: Evaluate and Approval by National Issuing Authority".	Following a change of approach, Models A, B and C deleted from text. The comment is therefore no longer applicable.
0005 BR		1.2	Model B Title	ge	I understand that the title isn't appropriate to the concept given about Model B.	I suggest substitute for "Model B: Evaluate by Third Party Conformity Assessment and Approval by National Issuing Authority"	See response to 0004.
0006 BR		1.2	Model C Title	ge	I understand that the title isn't appropriate to the concept given about Model C.	I suggest substitute for "Model C: Evaluate/Approval by Third Party Conformity Assessment and Registered by National Issuing Authority"	See response to 0004.
0007 BR		1.3	Fourth Paragraph Last phrase	te	According to continuous improvement concepts, it is also necessary to include possible changes in type approval procedures, including laboratory testing procedures.	Depending on circumstances, the experience gained during verifications may justify later changes in the type approval concerning instrument design, manufacturing process, application of the type, type approval procedures (maybe including laboratory testing procedures) or required verification procedures; in extreme cases, it might even result in suspension or withdrawal of the approval.	Not agreed. This phrase relates to type approval and not the type evaluation processes.
0008 FR		2.6			Here also the concept of the responsibility of the manufacturer concerning conformity to the requirements seems to be missing (see responsibility of manufacturers in EU directives)		Noted. However, no proposal has been submitted so there is no change to text.
0009 FR		2.12			It is important to make a reference to the field of accreditation (and not to accreditation in general)		Terms "accredited laboratory" and "laboratory accreditation" deleted as "accreditation" is defined.
0010 BR		2.12	Note First phrase	ed	The word "technical" is wrote separated. Take off the space between "c" and "a".		Agreed.

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0011 FR		2.14			The definition of Legal metrology authority is not right. The legal metrology authority is the entity in charge of regulation and market surveillance. In some country, it is also the entity of type evaluation, in other it is not the same entity. The authority is at least in charge of regulation. For example in EU the notified bodies are not public authorities but private bodies. There should be a reference to bodies in charge of certification of type or pattern	The definition of Authority in D9 is more adapted: "Public (Government or local Government) body authorized by law on a national level to be responsible for metrological supervision as a whole or in part » It could be necessary to add a definition of type evaluation authority.	Partially agreed. Modified text from D 9:2004 added, and definition of "national issuing authority" from B 18:2022 also added.
0012 FR		2.22			There is a definition of type in VIML, clause 4.06. Why do not harmonize?	Replace the definition by the definition: "definitive model of a measuring instrument (including a family of instruments) of which all of the elements affecting its metrological properties are suitably defined.	Agreed.
0013 BR		3.1	First Paragraph Third phrase	ed	Take off the second term "to permit" because is an unnecessary repetition.	Type evaluation is an objective process of determining facts concerning a model or range of instruments, while type approval is the decision, based on these facts and involving judgment, to permit or not that model or range of instruments to be used for regulated purposes.	Not agreed. "to permit" and "not to permit" are two different things so it makes sense to retain.
0014 BR		3.1	First Paragraph Last phrase	ed	Replace "and" with period.	The approving official will often not be the official(s) who carried out the evaluation. This Document is drafted on the assumption that these officials are will be distinct.	Agreed.
0015 BR		4.2	Title	ed	Title must start with uppercase letter	Replace "examination" with "Examination"	All titles start with an uppercase letter.
0016 BR		4.2.2	First paragraph First phrase	ge	Change the term "metrology agency" by "metrology authority" as in the rest of the text.	Replace "The approval authority metrology agency" with "The approval metrology authority"	Partially agreed. The term "national issuing authority" has been used.
0017 BR		4.2.4	First topic	ge	Change "agency" by "authority"	Is the applicant properly authorized by the manufacturer and acceptable to the legal metrology authority?	Agreed.
0018 BR		4.3.2	First paragraph	ge	Change "agency" by "authority"	Replace "agency personnel" with "authority personnel"	Agreed.
0019 BR		4.4	Title	ed	The word "Evaluation" must start with uppercase letter	Replace "evaluation" with "Evaluation".	Not agreed.
0020 BR		4.4.1	First paragraph First phrase	ed	Including the word "a" and "type"	In a complete type evaluation...	Agreed.

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0021 BR		4.4.3	First paragraph Last phrase	ed	Insert the word “type”	A limited type evaluation may be carried out when the results of a previous type evaluation in another jurisdiction are available and tests are carried out to quickly establish confidence in the previous results or to establish which of the characteristics of a type may have been affected by its modification.	Agreed.
0022 BR		4.8	First paragraph First phrase	ed	Take off one “that”	On the basis that the personnel carrying out...	Agreed.
0023 BR		4.8.4	point c Last topic	ed	Change “agency” by “authority”	required availability for inspection by legal metrology authority of manufacturer's facilities	Agreed.
0024 BR		4.8.4	point d Both topics	ed	Change “agency” by “authority”	<ul style="list-style-type: none"> <li>required notification of legal metrology authority concerned or registration of instruments upon sale, purchase, installation, putting into use, recalibration, or repair of instruments</li> <li>required notification of legal metrology authority concerned upon changes in specified</li> <li>components or materials in the type of instrument (see point 2.2.4)</li> </ul>	Agreed.
0025 BR		4.9	Last Paragraph Last phrase	te	According to continuous improvement concepts, it is also necessary to include possible changes in type approval procedures, including laboratory testing procedures.	Depending on circumstances, the experience gained during verifications may justify later changes in the type approval concerning instrument design, manufacturing process, application of the type, type approval procedures (maybe including laboratory testing procedures) or required verification procedures; in extreme cases, it might even result in suspension or withdrawal of the approval.	Not agreed. See response to comment 0007.
0026 FR		4.11			The certification body shall in any case examine the test results provided to check if all tests have been performed by the other body as required by the OIML RI and if the results are actually correct		Not agreed. It is for the certification body to determine the extent of the evaluation that they conduct.
0027 CA		5.1.1	Last Paragraph	ge	Addition of an expected service standard by the client.	The requirements should also describe the documentation, the conditions of the instrument to be submitted for approval, <b>the expected turnaround times (service standards)</b> and the fees which are payable.	Agreed. Models B and C have been deleted, but text has been added to the relevant subclause for what used to be called “Model A”.

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0028 BR		5.1.5		te	Replace “manufacturer or others who receive” by “applicant” Include “to conduct out initial verification”	The system documentation should clearly set out the continuing obligations on applicant of type approval. This may include obligations to place a type approval marking on the instrument, to conduct out initial verification and to notify the authorities of any modifications in the approved instruments.	Clause deleted so comment is no longer applicable.
0029 CA		6.1.1	List of inclusions	ge	Addition of an expected service standard by the client.	Categories of instruments, and types of applications subjected to regulatory control • Relevant National Legislation pertaining to the weighing and measuring instruments and activities subject to regulatory control • Clear communication of the scope/rationale for control (e.g. instruments meant for trade purposes, to ensure fair weights and measures, etc.) • Supporting documentation required • <b>Expected turnaround time (service standard)</b> • Fees payable	Clause deleted so comment is no longer applicable.
0030 CA		6.2	Title	ge	Addition of the definition of a “Type Registration”	Addition of a definition of a “Type Registration” within section 6.2 or within section <b>2 Terms and Defintions.</b>	Clause deleted so comment is no longer applicable.
0031 BR		7.2.1	First Topic Second Paragraph	ed	Replace “comple-d” with “complied”.	• identification of the request application for pattern type approval, applicant, manufacturer, and approving authority and official; regulations complied with and jurisdiction(s) where approval is valid; specific instruments, components, and salient documents examined.	Unable to find “comple-d” in text.
0032 BR		7.8	First Paragraph First phrase	ed	Replace “model” with “type”.	In the course of the control process, the approval or registration authority often obtains proprietary information related to the type or range, manufacturing techniques, etc.	Agreed.
0033 BR		Annex	Title	ed	Replace “CERTIFICATION” with “CERTIFICATION”.	ADDITIONAL INFORMATION ON THE OIML CERTIFICATION SYSTEM (OIML-CS)	Agreed.

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