

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
NL 001				ed	A large series of double spaces after the end-of-sentence dot	Remove additional spaces.	Accepted – Spaces will be standardised in the editorial process
NPL 002	6			ge	Better to avoid “dimension” in a metrology text unless used in the technical sense	Change title to “International Aspects”	Accepted
PU, MK 003	All			ge	The current draft is too long to be read by decision makers. Any additional material would make the situation worse. The original intention of the document was to give decision makers a good advice, how to setup a metrology law, which covers different aspects of metrology. It doesn’t need to be a “bible”, where you can read everything about metrology. Therefore the text could be shortened very much. However, if there is some intention to produce a document, which gives some overview about metrology, this could be done by an additional document.	Concentrate only on the relevant texts, which are relevant for decision makers. All general descriptions about metrology should be taken as annexes or even better, in a second document.	Not accepted. D 1 is used mainly as a reference document by experts advising Governments. A shorter summary for policy-makers would be useful but would be better provided separately, and perhaps by the advisers themselves
PU, MK 004	All				General comments on several parts: Part 3: in general o.k., but partly too detailed Part 4: too short, figure 5 could be better	General proposals: Part 3: could be shortened	Partially accepted. Part 4 has been/will be moved to Part 3 as 3.5. and Part 5 has been/will be transferred to the introduction of what was Part 7. More substantial redrafting, however, will make it unlikely that a document can be agreed this year.

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
					<p>Part 5: could be a little bit more concrete to give decision makers a clear picture, what is expected from them</p> <p>Part 7: in general o.k., but partly too detailed</p> <p>Annex B: OIML-CS and CIPM-MRA could be mentioned as examples</p> <p>Annex C (Glossary) is missing</p> <p>Figures: The figures are very different.</p>	<p>Part 4: some concrete items could be added, which describe the support of the other NQI institutions by the NMI:</p> <ul style="list-style-type: none"> - support of the accreditation body by supplying experts as assessors for accredited calibration laboratories - support of the standardisation body by supplying technical experts from the NMI for technical committees - support of interlaboratory comparisons of accredited calibration laboratories by the NMI - support of the verification authorities with technical expertise from the NMI - support of the market surveillance authorities with technical expertise from the NMI <p>Figure 5 could be improved</p> <p>Part 5: some concrete items could be added, which describes the tasks of government:</p> <ul style="list-style-type: none"> - responsibility to setup a law on metrology - responsibility to setup a NMI and Legal Metrology Authorities - responsibility to ensure sufficient ressources for the NMI and the Legal Metrology Authorities <p>Part 7: could be shortened</p> <p>Annex B: mention OIML-CS and CIPM-MRA as examples</p> <p>Develop Annex C (Glossary)</p> <p>Figures: Develop the figures in a way, that they show some "corporate identity".</p>	<p>Drafting suggestions on these lines would be welcome relating to the new section 3.5 in the 2CD</p> <p>March PG meeting will be asked to consider all the figures and diagrams when technical expertise from BIML is available</p> <p>Drafting suggestions would be welcome if these are still considered necessary given the new placing in the 2CD</p> <p>See above</p> <p>Drafting suggestions would be welcomed</p> <p>2CD now includes Annex C</p>
PU, MK 005	10			ed	Correct reference to PTB report of Eberhard Seiler	<p>Instead of "PTB report Steps towards a National Metrology System (Eberhard Seiler)"</p> <p>It should be written: "PTB report "Steps towards a National Metrology System" (Eberhard Seiler, April 2017)"</p>	Agreed

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
PS 006	All			Question	Which language should be used in the document? American English spelling has been used, is this correct?	Use English Spelling rather than American English Spelling.	New policy within OIML is to use European English spelling rather than Transatlantic English spelling
CIPM 007			03.2.2	ed	Wrong reference to paragraph 7.1.1. 7.1.1 does not exist.		Agreed. Reference should be to 7.3.1. This has been corrected
NPL 008	1		2	ed	Capitilisation	National Quality Infrastructure	Accepted
COOMET 009	Foreword		2 nd para from bottom	ge	Since the CIPM decided in 2016 to collaborate with OIML on that project, and the CIPM President wrote the corresponding letter to OIML in 2017, BIPM is not Number One.	Replacement of 'BIPM' for 'CIPM' in the sentence: "This publication – reference... - was developed by OIML and BIPM CIPM through a Project Group...	Not accepted. The CIPM President's letter to the OIML President of June 1st explicitly talks about a joint OIML/BIPM publication, and participation in the OIML AG is via the BIPM staff, as is the primary drafting input.
NPL 010	2	01			English usage	"...whatever the measurement uncertainty and field of application"	Accepted. This is copied from definitions in the VIM and VIML
NPL 011	3	01	3	ed	A bulleted list could replace figure 3		Not accepted. The visualisation of the relationship between the various components of a metrology system is an important part of Figure 3
NPL 012	4	01	4	te	Some measurement standards in chemistry and biology are capability based rather than physical	The physical measurement standards and capability on which traceability chains are built	Accepted
NPL 013	3	02	2	ed	Word missing	"The NMI will also be the most suitable..."	Accepted
NPL 014	3	02	2	ed	Wrong words	"ensuring the international recognition...to trade through participation at regional..."	Accepted
NPL 015	6	02	2	ed	Wrong of acronym	Universal Coordinated Time (UTC)	Accepted
CO 016	2.2		1	te	The "credible" term does not apply in this case, the "reliable" term applies	accurate and reliable measurement	Accepted

1 MB = Member body / NC = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 Type of comment: ge = general te = technical ed = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
PU, MK 017	2	02.04	Para 2, second item	ge	It is the intention of the OIML, that instruments examined resp. certified in one country should be approved also in another country, without doubling any testing, e. g. by making use of the OIML-CS. Therefore the second item should be rewritten.	Instead of “A device tested and approved for use in one country may also be sold and used in another country, without further technical inspections” it should be written: “A device tested and approved for use in one country may also be approved for use in another country, without doubling testing”	Accepted. It is suggested that “duplication of testing” may be better English
COOM ET 018	2	02.04	Para 5	ed	Plural form of ‘euro’	Examples: A measurement error... billions of euro euros and dollars!	Accepted
NPL 019	7	03	1	ed	Missing word	“...NMI functions may be carried out by one or more organisations...”	Accepted
NPL 020	7	03	1	Ed	Wrong word	“...in particular as regards their input into BIPM’s work.”	Accepted
PU, MK 021	3	03.01	Figure 2	ge	The description of Tier 1 in figure 2 doesn’t correspond to the caption of the figure.	Instead of “Tier 1 – National standards” it should be written: “Tier 1 – Scientific metrology”	Accepted. Figures and diagrams will be made more consistent after the March PG meeting
COOM ET 022	3	03.01	Para 3	te	The Document “Evolving Needs for Metrology in Trade, Industry and Society and the Role of the BIPM” (April,2003) implies the NMI activities in forecasts.	b)Setting metrology within the national policy , including measurement needs forecast , for Quality Infrastructure so that the public good bodies responsible for metrology, standards and accreditation work in a complementary way	First point: re ‘public good’ Not accepted. Not all bodies involved are public bodies. The English term ‘public good’ in English means ‘common or natural good or wellbeing’ (from the Oxford English Dictionary), or, from the web ‘a commodity or service that is provided without profit to all members of a society, either by the government or by a private individual or organization’. Second point: Partially accepted. We propose to deal with this in i) as: ‘i) Considering measurement needs forecasts and conducting

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
							research into new or better measurement techniques.'
COOMET 023	3	03.01	Para 3	ed	Correction: Delete unnecessary word 'good' Delete –' single unquote at the end of b)	Setting metrology within the national policy, including measurement needs forecast, for Quality Infrastructure so that the public good bodies responsible for metrology, standards and accreditation work in a complementary way	First point - See above Second point – Accepted – propose to d Delete –' single unquote at the end of b)
PS 024	Part 3	03.01 - Page 12	Figure 1	Addition of text to expand on responsibilities	Tier 1 – Policy and Legislation: Add reference for the establishment and communication of a 'compliance strategy'.	Responsibility for the establishment and communication of a regulatory compliance strategy for legal metrology controls.	Partially accepted. A regulatory compliance strategy should be regarded as part of Regulation policy, but we propose to add "(including regulatory compliance strategies)"
CO 025	3.1		3	te	Include a literal where metrology is pointed out as a tool and support for research	s) Metrology should be considered as a fundamental tool and support for the validity of research.	Not accepted. 3.1 is a list of metrology activities. This comment relates to an application of metrology, which is dealt with elsewhere
NL 026	3	03.02.2	p. 14	ed	Second par of 3.2.2: capital T in "The objectives..."	Non-capital t	Accepted
NL 027	3	03.02.2	p. 15	ed	Page 15, end of 4 th paragraph: ref to 7.1.1, which does not exist	Perhaps 7.3.1 is the right reference?	Accepted
NL 028	3	03.02.2	p. 16	ed	Page 16, line 3: incorrect English	Remove "should"	Accepted
COOMET 029	3	03.02.2	Para 1	ge	More on NMIs.	Right after Para 1 there should be inserted: ... worldwide scientific cooperation relating to metrology. Thus and so the nominated NMI is not subject to accreditation in their field of activities, taking into consideration their participation in CIPM MRA.	Partially accepted. Proposed wording seems too specific for an introduction, but suggest addition to the third from last Para of 3.2.2 so that it reads:

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
							For an NMI (or DI) calibration and measurement capabilities to be recognized within the CIPM MRA the laboratory must operate a quality management system complying with the appropriate international standards, namely ISO/IEC 17025 (and if the laboratory produces reference materials, ISO 17034). Accreditation of NMI measurement services is not required by the CIPM MRA, though many NMIs are accredited. The decision to accredit or not rests with the NMI (or their governing ministries).
LC 030	3	3.2.2	1 st paragraph, 2 nd line on page 16	ed	This is best achieved when NMI funding should respects the following conditions	Change “respects” to respect.	Partially accepted – grammar has been improved by deleting “should”
COOMET 031	3	03.02.2	Para 10	ed	Grammar correction: “should respect”	In the para beginning with: In all cases, the institutes should be impartial. ... This is best achieved when NMI funding should respect the following conditions:”	Partially accepted. The better solution is to delete “should”
COOMET 032	3	03.02.2	Para 2	ed	Correction: ‘the’ should be with the small letter ‘t’	Collectively, and within the framework of the Meter Convention, the objectives of the metrology community worldwide are to ensure that:...	Accepted
PU, MK 033	3	03.02.2	Para 2, second item	ge		Instead of “Long-term trends can be used for decision-making” It should be written: “Long-term trends can be detected by sufficient accurate measurements for decision making”	Accepted
COOMET 034	3	03.02.2	Para 4	ed	Consistency in enumerating the functions.	It is the function of an NMI to be in charge of <ul style="list-style-type: none"> establishing disseminating.... provide providing expertise through national, regional... 	Accepted
COOMET 035	3	03.02.2	Para 5	ed	Correction: skipping of a verb	The NMI will also be the most suitable means for...	Accepted

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
COOM ET 036	3	03.02.2	Para 7	ed	Reference to item 7.1.1 which is not available in this document.	7.1.1 should be either deleted or replaced by the corresponding item, if available, in the text.	Accepted - the correct reference should be 7.3.1
PS 037	Part 3	03.02.2 - Page 15	Para 5	Typo	The NMI will also the most suitable mean	The NMI will also be the most suitable mean	Not accepted – the “also” is intentional to demonstrate that this function is additional to the preceding list
COOM ET 038	3	03.02.2.	Para 6	ed	Item 7.5, to which is the reference, does not relate with BIPM.	Delete the phrase in the brackets: (see 7.5 below)	Accepted. The reference was intended to be to what became 7.6, but that has since been redrafted and the reference can be safely deleted.
PU, MK 039	3	03.02.3	Para 1	ed		Instead of “In addition is it necessary to make” It should be written: “In addition it is necessary to make”	Accepted
LC 040	3	3.2.4	3 rd line on page 17	ed	The missions of the LLMA should be to	Insert Local legal metrology authorities before LLMA and put LLMA in parenthesis to introduce acronym LLMA. Sentence should now read “The mission of the local legal metrology authority (LLMA) should be to”	Accepted
LC 041	3	3.4.4	5 th line in the 3 rd paragra ph on page 20	ed	The acronym CMA is not defined	Insert full name for CMA and put CMA in parenthesis.	Partially accepted – the concept of a Central Metrology Authority has been replaced by a Central Government Authority and this is now spelled out
PS 042	Part 3	03.02.4 – Page 16	Heading	Name Change	Change name to reflect function of role	‘Legal Metrology Regulatory Authority’ or ‘Legal Metrology Enforcement Authority’	Not accepted - some legal metrology authorities will take regulatory decisions (which implies more policy making and discretion) while others will be more purely concerned with enforcement – the section is meant to cover both.

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
PS 043	Part 3	03.02.4 – Page 17	Para 3	Wording	Change wording to remove ‘in the field’	implement the Law of Metrology (practical application)	Partially accepted - “in the field” is too colloquial, but LLMA are not the only ones implementing the law. Suggest adding “ through interactions with individual businesses ”
COOMET 044	3	03.02.5	Para 1	ge	Correction: in accordance with the COOMET countries experience	In the sentence “In some case these services may be provided by...” delete “often” and “more efficiently”. The sentence in the document would be: “In some cases these services may be provided by public authorities or institutes but it will also be possible for these services to be supplied by the private sector.”	Partially accepted. D 1 is neutral between liberal market economy systems and planned economy systems, so we suggest amending to: “ In some cases services below the national laboratory level may be provided by public authorities or institutes but in many countries these services are supplied by the private sector. ”
COOMET 045	3	03.02.5	Para 1	ed	Correction: In some cases	In some case cases these services may be provided by public authorities....	Accepted
PU, MK 046	3	03.02.5	Para 1	ge	In many countries around the world it is definitely not the case, that private bodies work “more efficiently” in general. Such statements are absolutely not acceptable to be written in an international document as they discriminate authorities. The text must be rewritten in a neutral manner.	Instead of “In some case these services may be provided by public authorities or institutes but often it will be possible for these services to be supplied more efficiently by the private sector.” it should be written: “In some cases these services may be provided by public authorities or institutes but it could be possible for these services to be supplied by the private sector.”	Accepted in principle – see proposed wording above
PU, MK 047	3	03.02.7		ed	Missing dot.	Instead of “and the National Accreditation Body This may include” It should be written: “and the National Accreditation Body. This may include”	Accepted
PS 048	Part 3	03.04.3 – Page19	Heading	Font	Font size in not consistent in the heading	Consistent use of font size in final document	Accepted. This will be picked up in the final editing of the Document!

¹ MB = Member body / NC = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² Type of comment: ge = general te = technical ed = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
COOM ET 049	3	03.04.4	After para 1	ge	It is expedient to add general information about metrological traceability.	A new extra para should be inserted after the 1 st para: In legal metrology the metrological traceability can be realized through verification procedures.	Not accepted. The proposed wording is not consistent with the definition of metrological traceability.
NPL 050	2	04	2	te	kg is a measure of mass not quantity	A prepackage labelled "1 kg" in one country contains the same mass of product as in another country.	Not accepted Technically this is obviously right, but talking about mass in a document aimed at lay people may not be helpful, especially if the current text is not actually wrong in layman's terms
NPL 051	2	04	3	ed	If a quote this should be attributed but looks like paraphrase of Lord Kelvin		Accepted. Unlike the other bullets in 2.4 this is not actually an example, so it has now been omitted.
PU, MK 052	4	04.01	Second last part	ed	Singular instead of plural.	Instead of "means that reform of a countries metrology systems" It should be written: "means that reform of a countries metrology system"	Accepted
NPL 053	2	06	1	ed	VIM needs some explanation on first use	"...included in the International Vocabulary of Metrology (VIM)..." plus reference3	Accepted
CO 054	6.2	6.2.1	1	ge	The term "resigned" up is not appropriate, en el documento de 2018 se usa "reaffirmed"	In November 2018, BIPM, the OIML, ILAC and ISO reaffirmed a joint declaration on metrological traceability ...	Accepted.
PS 055	Part 6	06.02.1 – Page 24	Para 1	Typo	Use of word, resigned.	Consider 're-signed' as an alternative	Accepted - changed to "reaffirmed"
LC 056	6	6.2.1	1 st line in this clause on page 24	ed	BIPM, the OIML, ILAC and ISO resigned....	Change resigned to re-signed	Accepted - changed to "reaffirmed"
COOM ET 057	6	06.02.2	Para 1	ge	The introduction phrase about the Meter Convention can be borrowed from SI Brochure.	The suggested below text should replace the lines in the document. The International Bureau of Weights and Measures (BIPM) was set up by the Metre Convention signed in Paris on 20 May 1875 by seventeen states during the final session of the diplomatic Conference of the Metre.	Partially agreed: It is suggested that the current text is amended to read:

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
						<p>The BIPM operates under the exclusive supervision of the International Committee for Weights and Measures (CIPM) which itself comes under the authority of the General Conference on Weights and Measures (CGPM) and reports to it on the work accomplished by the BIPM.</p>	<p>The BIPM is the intergovernmental organisation established by the Metre Convention, through which Member States act together on matters related to measurement science and measurement standards. <i>The BIPM operates under the exclusive supervision of the International Committee for Weights and Measures (CIPM) which itself comes under the authority of the General Conference on Weights and Measures (CGPM) and reports to it on the work accomplished by the BIPM.</i></p>
PU, MK 058	6	06.02.2	Para 1	ge	<p>In our opinion the statement “The BIPM is the intergovernmental organisation established by the Metre Convention,...” is not correct, at least not in line with the current edition of the SI brochure. There have been intensive discussions within the CIPM and with the Director of the BIPM about the role and the self-conception of the BIPM. Finally a task group has been established to deal with the different views. As long as the task group is working and has not yet reported any results, in our point of view, the sentences of the current SI brochure should be taken.</p>	<p>Instead of “The BIPM is the intergovernmental organisation established by the Metre Convention,...” It should be written: “The International Bureau of Weights and Measures (BIPM) was set up by the Metre Convention signed in Paris on 20 May 1875 by seventeen States during the final session of the diplomatic Conference of the Metre.”</p>	<p>Partially accepted – see above</p>
COOM ET 059	6	06.02.2.1	Para 1	ge	<p>It is necessary to use the term ‘State Parties to the Meter Convention’</p>	<p>Should be replaced: “its Member States” for “State Parties to the Meter Convention. The sentence would read: “The mission of the BIPM is to work with the NMIs of the <i>States Parties to the Meter Convention</i>, the RMOs and strategic partners worldwide.....”</p>	<p>Partially accepted. It is proposed to: add a footnote after ‘Member States’* as follows:</p>

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
							<i>*The official term is "States Parties to the Metre Convention"; the term "Member States" is its synonym and used for easy reference.</i>
COOM ET 060	6	06.02.2.2	Para 1	ge	The text should be rewritten	<i>"The CGPM is the plenary organ of the BIPM, which"</i> should be deleted. Then the sentence would be like: "The CGPM consists of the delegates of all the contracting Governments."	Not accepted. The existing wording is the correct description of the role of the CGPM.
PU, MK 061	6	06.02.2.2	Para 1	ge	In our opinion the statement "The CGPM is the plenary organ of the BIPM ..." is not correct, at least not in line with the current edition of the SI brochure. There have been intensive discussions within the CIPM and with the Director of the BIPM about the role and the self-conception of the BIPM. Finally, a task group has been established to deal with the different views. As long as the task group is working and has not yet reported any results, in our point of view, the sentences of the current SI brochure should be taken.	Instead of "The CGPM is the plenary organ of the BIPM ..." It should be written: "The BIPM operates under the exclusive supervision of the International Committee for Weights and Measures (CIPM) which itself comes under the authority of the General Conference on Weights and Measures (CGPM) and reports to it on the work accomplished by the BIPM."	Partially accepted – see above
PU, MK 062	6	06.02.2.3	Para 1	ge	The term "bureau" is used in a confusing way.	Instead of "A "bureau" of the CIPM is set up as a restricted collegial organ of the CIPM, ..." it should be written: "A steering group of the CIPM is set up as a restricted collegial organ of the CIPM, ..."	Not accepted. The current wording is correct - the bureau of the CIPM has various responsibilities but these do not include 'steering' the CIPM.
PU, MK 063	6	06.02.3.5	Para 2	ge	The OIML-CS will have no Scheme A and B anymore from 2021 on. When the OIML D1 will be published (hopefully after the next CIML meeting), most probably in November or December 2020, then the Schemes A and B will exist only for a few weeks.	Delete the whole sentences: "It is a single Certification System comprising two Schemes: Scheme A and Scheme B." and: "The requirements for the participation of OIML Issuing Authorities and their associated Test Laboratories in Scheme A or Scheme B are the same, but the method of demonstrating compliance is different."	Not accepted. Scheme B will continue to exist and will be available for new instruments moving into the system

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
PU, MK 064	6	06.03.1	List of ISO standar ds	ge	When all ISO standards are listed, which are relevant for metrology, then the ISO/IEC 17020 for inspection bodies should be mentioned, too.	Add the ISO/IEC 17020 to the list.	Accepted in principle, although ISO still have to comment and may wish to shorten or remove this list.
LC 065	6	6.3.1		ge	The International Telecommunications Union (ITU) is not mentioned in this section.	Insert a section on the ITU.	Not accepted at this stage – the references to other organisations are likely to be reduced rather than expanded in this section
COOM ET 066	6	06.04		ge	The previous and the proposed titles of the document are related with Metrology and National Metrology Systems and do not concern standardization and accreditation	In item 6.4 the two whole paragraphs about regional standardization and accreditation organisations should be deleted, starting from: “Within the standardization fields, similar regional organisations provide for:..... closing with “...personnel and other programmes of conformity assessment.”	Not accepted at this stage – covering the relationship of metrology activities with the wider QI landscape was an essential element in this revision. The March meeting of the PG will need to discuss this further
PU, MK 067	6	06.04		ed	There are three occurrences of the wrong abbreviation “RMLOs”.	Instead of “RMLOs” write “RLMOs”	Accepted
COOM ET 068	6	06.04	Para 1	ge	“ the BIPM membership” does not exist. Mind the word ‘wide’ after changing the sentence.	In the final sentence there should be deleted: “ than the BIPM membership ”. Once the change is made, the word “wider” will become “ wide ” and the sentence will look like: “The RMO membership is wide (particularly in Africa), and thus countries with very limited metrological capacity in...”	Not accepted - the addition of the footnote above [059] addresses this issue.
COOM ET 069	6	06.04	title	te	The section 6.4 is devoted to RLMOs and RMOs. So the subtitle should be more specific.	The title of 6.4 Regional Organisations could be: RLMOs and RLMOs	Not accepted at this stage – see comment 067
LC 070	6	6.4	3 rd paragra ph in this clause	ed	Regional Legal Metrology Organisations (RLMOs)	Change acronym from RMLOs to RLMOs	Accepted

¹ MB = Member body / NC = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² Type of comment: ge = general te = technical ed = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
LC 071	6	6.4	Last paragraph in this clause	ed	Ensure consistent use of acronym RLMO in this paragraph e.g. and the RLMO is (WELMEC).	Change RLMO to RLMO	Accepted
PS 072	Part 7	07.02 – Page 35	Bullet points	Typo	Text refers to three options yet four are sited	Bullet points should be '1 to 3'. Current point 'd' should be next sentence following three bullet points	Accepted – this was an error now corrected
COOMET 073	7	07.03.1	Para 2	ed	Item 7.5, to which the reference is made, does not relate with the BIPM.	Delete the phrase in the brackets: (see 7.5 below)	Accepted – see comment 038 above
PU, MK 074	7	07.05.1			In many countries around the world it is definitely not the case, that private bodies work “more efficiently” in general. Such statements are absolutely not acceptable to be written in an international document as they discriminate authorities. The text must be rewritten in a neutral manner.	Instead of “Relying solely on this approach can be both expensive and not very effective. Techniques such a type approval controls, pre-market verification, pre-market surveillance, market surveillance in the distribution chain and intelligence-based inspections can all enhance the effectiveness of regulatory controls while reducing the overall cost of the system. Some of these techniques can be carried out by properly authorized private bodies, which may further reduce costs.” it should be written: “Another key decision is which of the various legal metrology “tools” should be used in any area of regulation. Traditionally, most of the emphasis was placed on verification of instruments when they were put into use. But this should be considered in the light of possible additional tools like type approval controls, pre-market verification, pre-market surveillance and market surveillance in the distribution chain, which could enhance the effectiveness of regulatory controls”	Partially accepted. D 1 should be neutral between public authorities and private bodies, but this is already dealt with elsewhere. We should be clear, however, that additional tools <u>are</u> likely to improve the effectiveness of control.
PU, MK 075	7	07.05.1		ed	One dot too much.	Instead of “when they were put into use..” it should be written: “when they were put into use.”	Accepted

¹ MB = Member body / NC = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² Type of comment: ge = general te = technical ed = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
PU, MK 076	7	07.05.1	Para 1	ge	The very important topic “trade” is not mentioned.	Instead of “... health, safety and environmental protection is taken into account. it should be written: “... trade, health, safety and environmental protection is taken into	Partially accepted – the point of the sentence was that Governments began regulating W&M for trade and the other areas followed. Sentence has been redrafted to make this clearer.
PS 077	Part 7	07.05.1 – Page 39	Para 3	Typo	Text reads: ‘One of first decisions governments need to make in how such are to be incorporated or referenced in their legal framework’.	One of the first decisions governments need to make in how such standards are to be incorporated or referenced in their legal framework.	Accepted
LC 078	6	7.6.1	5 th paragraph in this clause	ed	Never the less all NMI will need to undertake	Change NMI to NMIs	Accepted
LC 079	7	7.6.1	6 th paragraph in this clause on page 43	ed	They should always be seen as complimentary to national funding.	Change complimentary to complementary	Accepted
PS 080	Part 8	08.03 – Page 46	Para 3	Typo	Text reads: ‘where ministries and the CMA are’ followed by a hard return.	Remove hard return so text reads: ‘where ministries and the CMA are responsible for their issuance.’	Accepted. Hard return removed but “and the CMA” also now deleted as the concept of the CMA has been dropped
PS 081	Part 8	08.07 – Page 50	Para 3	Addition of text to expand on role	Text reads: The purpose of the surveillance of bodies or persons involved in legal metrology activities is to detect non compliances of these persons or bodies with their obligations, for example:	Suggested added wording to include reference to market confidence in surveillance activities. Adding a positive interaction can increase confidence of preparers in their control systems.	Accept in principle – probably needs a new paragraph at the end of 8.7. Could PS suggest wording?
PS 082	Part 9	09.01 – Page 53	Para 3	Wording	Change wording from: ‘In addition, there have been important developments over the past [??] years in the way in which metrology, in particular legal metrology, is practiced:’	‘In addition, there have been important contemporary developments in the way in which metrology, in particular legal metrology, is practiced:’	Accepted
PS 083	Part 9	09.03 - Page 54	Para 1	Wording	Suggest the inclusion of additional bullet point in relation to the increased complexity of fraud.	‘Increased complexity of fraud’	Accepted

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
PU, MK 084	9	09.03.1		ed	One space missing.	Instead of "Provision should be made for a regular review(for instance, every five years)" It should be written: "Provision should be made for a regular review (for instance, every five years)"	Accepted
PS 085	Part 9	09.03.5 – Page 54	Para 4	Wording	Suggest the inclusion of additional text in relation to the increased complexity of fraud and the need for regulatory stewardship to respond.	Technical advancements in metrology, including the increased reliance on computerisation and software developments, increase the potential for new sophisticated fraud in measurements and measurement systems. Metrology regulatory systems require the ability to be adaptive and contemporary. Regulatory stewardship recognises that regulatory systems are living systems and, as such, are subject to change. It understands the need to continually review the system's performance and anticipate, and respond to, those changes.	Partially accepted. Rather than adding this as a fifth element in 9.3 we propose to add this to 9.4 as a concrete example of the skills that legal metrologists will have to develop in the future
PU, MK 086	All	4,5,6,7		ge	The order of the chapters 4 to 7 is not logical.	The order of chapters 5 and 6 should be exchanged, because chapter 4 deals with in general with the "wider quality infrastructure", which fits to the overview of international metrology (current chapter 6). The current chapter 5 "Role of the government" can be seen in combination with chapter 7 "Policy options".	Partially accepted. This will be addressed by the restructuring discussed below (comment 087)
PU, MK 087	All	4,5,6,7		ge	In general there are many chapters, some of them being very short. For this reason the chapters 4 to 7 could be combined in one chapter.	Combine the chapters 4 to 7 in one chapter, or at least combine the current chapters 4 and 6 resp. 5 and 7 in two chapters.	Partially accepted. Chapter 4 will be moved to the end of Chapter 3 as 3.5, retitling the chapter "The concept of a National Metrology System and its place in the wider National Quality Infrastructure" and Chapter 5 will be moved to the beginning of Chapter 7, retitling the Chapter "The Policy Options facing Governments".

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date:2020-01-28

Document: 1CD revision of D 1

Project: CEEM AG/p 1

No.	Part number	Clause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations by the convener
LC 088	Annex A	Element No. 23		ge	The issue of whether the inspectors receive the protection of the State (e.g. accompanied by police officers) or LMO in carrying out their enforcement functions is not addressed in the Annex. Secondly guidance is needed on whether an inadvertent breach of the legal metrology regulations by an inspector is a breach committed by the inspector or his employer (e.g. the LMO) and whether the inspector is subject to or exempt from prosecution.		Not accepted – support for inspectors is already implied by the use of the word “empowered” and further explanation is too detailed for Annex A.
PS 089	Annex A	Element # 24	Element # 24 – Page 61	Wording	Text should be expanded to account for technical advancements in metrology and metrology systems.	‘where measuring equipment subject to legal control is, or may be installed, programmed, monitored, kept or used.	Accepted

Collation of files was successful. Number of collated files: 6

SELECTED (number of files): 6

PASSED TEST (number of files): 6

FAILED TEST (number of files): 0

CCT - Version 4.0/2015

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial