

Collated comments on First Working Draft (1 WD) with Observations		
PG Comments on: TC3_SC5_P5_N001	Title: Working Draft (1 WD): <i>OIML D xx Guide for the application of ISO/IEC 17065 to the assessment of measuring instrument certification bodies in legal metrology</i>	
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Convener: BIML – Paul Dixon		

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
AU-1		Gen	This document relies heavily on ISO/IEC 17025 for type evaluation. Australia would like to bring to the conveners notice that ISO 17025 is also under revision and is expected to be revised later this year.	Be aware of the proposed changes in ISO 17025.	High	Noted. Convener is part of ISO/CASCO WG44 which is responsible for the ISO/IEC 17025 revision.
AU-2		Gen	The nomenclature of the clauses in ISO/IEC 17065 (2013) and the Guide do not match. For instance clause G.6.1.2.1-4 in the Guide is clause 6.1.2.1-d in ISO/IEC 17065 (2013).	Please ensure that the clauses in the Guide have the same nomenclature as that of ISO/IEC 17065, for ease of reading.	Medium	Not agreed. This is the fourth item of guidance for section 6.1.2.1, and is not related to 6.1.2.1 d).
JP-1	General		After B18 and relevant documents are established, this Guide shall be revised again immediately.			The requirements of OIML B 18 and the new OIML-CS will be addressed in 1CD.
PL-1		gen.	It is quite difficult to comment on this document before its modification to align with the provisions pertaining to the CS, especially OIML B18:2016. The document can be changed essentially after the entry into force of the provisions relating to the new system.			See response to JP-1.
PL-2		gen.	As for the additional guidance that should be included in the document, in my opinion, it will also be possible, after taking into account provisions relating to the new certification system.			See response to JP-1.
CA-1	Title Page		Error in location of apostrophe of French title	“... à l'évaluation des...”		Agreed.
FR-1	Preamble	gen	It is stated that OIML D29 may be used for the accreditation of OIML Issuing authorities when required by the CIML member. Currently, for the OIML MAA and in the frame of B10, only the test laboratory shall be assessed following OIML D30. We would encourage, for MAA Issuing authorities, to move towards an evaluation following OIML D29.	This will be discussed during the work on the OIML certification scheme.		See response to JP-1.

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JP-2	Preamble		It is better to simplify the scope covered by this Document. This draft shows three cases: type evaluation on national legal metrology regulation, OIML Issuing Authority and voluntary based implementation of 17065. However, third one, voluntary based 17065, is not clear category and includes various situations. On the other hand, it does not need precise guideline because that it is voluntary. Consequently, third case had better to be deleted.	Delete the sentence, ‘on a voluntary basis for the implementation of ISO/IEC 17065 by national bodies responsible for type evaluation of measuring instruments or by OIML Certificate Issuing Authorities.’.		Partially agreed. Wording for the three cases has been improved.
JP-3	Preamble		According to ISO/IEC 17067, ‘Conformity assessment --- Fundamentals of product certification and guidelines for product certification schemes’, OIML certification in OIML MAA or OIML-CS is regarded as <i>Scheme type 1a</i> classified by 17067. It is better to say that OIML certification is classified as <i>Scheme type 1a</i> in ISO/IEC 17067 to make clear which parts of 17065 have to be applied.	Add a statement about the scheme type of OIML certification among various product certification schemes. For example, ‘OIML certification is classified as Scheme type 1a in ISO/IEC 17067 will be added just after the paragraph which begins with ‘In view of the specific regulatory’.		Agreed. This has been included in the proposed revision of OIML B 18.
NL-1	G.0-1	techn.	The text mentions “Type evaluation certificate” and “OIML Certificate”. With drafting the documents for the OIML Certification system the definitions have been reviewed to be consistent within the system	Use of Test Report, Type Evaluation Report and OIML Certificate of Conformity.	high	Partially agreed. Wording has been improved to reflect national type approval and issuing OIML Certificates.
NL-2	G.0-1	techn.	The text mentions “This document covers.. tests performed by the manufacturer..”	Change text: This covers only for the MAA (scheme A) the tests performed by the manufacturer in case that the MTL is approved by the participants (CPR/MC).	high	Partially agreed. This document applies to national bodies issuing national type approvals and also to OIML Issuing Authorities issuing OIML Certificates under the OIML-CS. Wording improved to align with OIML-CS.
NL-3	G.0-1	edit.	The text mentions “It should be remembered that...are issued on the basis of tests and examinations”.	“It should be remembered that... are issued on the basis of tests and examinations, indicated in the Type Evaluation Report and/or OIML Certificate of Conformity”.	medium	See response to NL-2.
AU-3	G.0-3	Tech	Conformity assessment tests could be carried out by first, second or third party for type evaluations. As per this guide, irrespective of where the test report is produced, the process of issuing certificate is still called third-party product certification. The level of scrutiny involved for test reports from first, second and third parties should be different.	The guide should specify requirements for bodies certifying products, based on the nature of the test reports submitted for certification. In other words, this guide should distinguish between the test reports produced by first party, second party and third party and specify requirements for each one of these.	High	Requirements for MTLs under the OIML-CS have been included in relevant sections of the Document.
NL-4	G.0-3	gen.	Reference is made to the publication B3 and B10, while the new certification system is expected to become into force on 1 January 2018.	Add a note with reference to the new system	low	See response to JP-1.

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NL-5	G.0-3	gen.	Reference to the manufacturer test results	See G.0-1 item 2	low	See response to NL-2.
NL-6	G.1-1	gen.	Reference is made to national evaluation bodies. The OIML CS distinguishes Issuing Authorities and Test labs.	Define national evaluation bodies.	medium	Term changed to national issuing authority, with definition added in section G.3-2.
JP-4	G.1-2		For easiness of understanding, G.1-2 had better to be fitted with G.1-1. Because national type evaluation is performed by national type evaluation bodies and OIML certificate issuing by OIML Issuing Authority, G.1-2 is mismatched with G.1-1..	Change to G.1-2 “Third-party conformity assessment” is national type evaluation and OIML certificate issuing..		Agreed.
NL-7	G.1-2	gen.	Text: “(including range of models and or family(ies) of measuring instruments).	Include “parts”	low	Wording aligned with OIML B 18.
FR-2	G.1-3	techn	We should include in the definition of “product” the measuring instruments modules. This is foreseen by some OIML recommendation and would be consistent with G.0-1.	The word “product” shall be understood as meaning the measuring instrument type (including range of models and/or family(ies) of measuring instruments and modules of instruments) subject to OIML type evaluation. Processes and services are not relevant to OIML type evaluation and certificate issuing.		See response to NL-7.
SE-1	3, G.3-2	techn	<i>Supervision</i> In ISO/IEC 17065, this step in the certification process is called review. Swedac suggest to use the same terminology. Also, according to ISO/IEC 17065 there shall be identified responsibility for the review, but there is no requirement on that person being managerial staff. The competence should be more important than the organsiational belonging. See also comment for G5.1.3.3.	Use the term “review” instead of “supervision”. Remove “managerial”.		Deleted the terms ‘evaluator’ and ‘supervisor’ as they do not appear in ISO/IEC 17065.
DE-1	G.3-2, Type approval, note	Techn.	It is confusion use “type evaluation” as a synonym for “type approval”, since this term may also be valid for the OIML certification.	Replace “type examination” by “national type examination” in the note to G.3-2 and later on.		Note amended to reflect that type approval is the issuing of a national type approval or an OIML Certificate, based on the outcome of a type evaluation.
NL-8	G.3-2	edit.	Type evaluation... “... contained in the evaluation report...”	Remain using the definitions: Type evaluation... “... contained in the Type Evaluation Report...” to avoid misunderstanding. Also keep consistency in the total document	low	The definition is from the VIML. However, a note has been added to specify that ‘evaluation report’ is ‘type evaluation report’.

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NL-9	G.3-2	techn.	Type Approval: What is meant by “ expected to provide reliable measurement results over a defined period of time”? The type examination does not / partly cover this aspect. Furthermore, the note mentions suggest that type evaluation = type approval. This is not the case.	Delete or clarify	medium	The definition is from the VIML. However, the note has been amended – see DE-1.
NL-10	G.3-2	gen.	Why to introduce the term “Evaluator” while the standard clearly describe the designation of staff performing the evaluation “7.5.1 The certification body shall assign at least one person to review all information and results related to the evaluation. The review shall be carried out by person(s) who have not been involved in the evaluation process.”	Delete	medium	See response to SE-1.
NL-11	G.3-2	gen.	Why to introduce the term “Supervisor” while the standard clearly describe the role of the certification body that has the supervision not as a body but as a person, group of persons or board (5.1.3). Nevertheless, the certification body shall have sufficient knowledge of metrology.	Delete	medium	See response to SE-1.
NL-12	G.3-3	edit.	This item has no header and can be interpreted as subject of Supervisor.	Include header	low	Supervisor deleted so no need for header.
NL-13	G.4.1.1-1	techn.	In case the legal entity is a public administration this shall be interpreted as the certification body and act and fulfill all requirements of the ISO/IEC 17065 as a certification body.	Add: In this case the public administration body shall act as certification body and comply with the requirements identified in the standard as mentioned in par. 5.1.3 of the standard	high	Agreed.
JP-5	4.1.2.1		For OIML certification, Requirement on the responsibility of clients is very little. On the other hand the responsibility of OIML Issuing Authority is defined clearly by OIML documents. Then the certification agreement between certification body and its clients is not so important. It is not necessary to apply 4.1.2 strictly.	Change to 4.1.2.1 Not applicable for OIML certification 4.1.2.2 Not applicable for OIML certification..		Not agreed as national type approvals are under the scope of this Document.
AU-4	4.1.2.2	Edit	Delete ‘No’ after 4.1.2.2.		Low	Agreed.
CA-2	4.1.2.2		Section begins by indicating “No” but is immediately followed by guidance.	Remove “No” in 4.1.2.2		Agreed.

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CA-3	4.1.2.2		Guidance provided does not read well when read with the applicable ISO 17065 section. Is the last sentence (i.e. “In the present legal...” intended to be part of this section?	OIML Guidance to section 4.1.2.2 (G.4.1.2.2-1) The certification agreement shall have provisions to ensure that the manufacturer is informed of its responsibilities and that any modification to an approved type shall be notified to the certification body before being implemented. In the present legal metrology procedures, changes in the standards do not affect type evaluation or OIML Certificates previously granted.		Sentence deleted.
FR-3	4.1.2.2	edit	Delete “No”			Agreed.
DE-2	4.1.2.2	Edit.	Incomplete comment	Replace “No” by “No OIML guide”		Guidance is provided so “No” deleted.
NL-14	OIML guidance to section 4.1.2.2.	gen.	No reference given in the document and text is unclear for “This applies in ...	Reference in to previously granted certifications remain valid is not part of the guidance of the standard ISO/IEC 17065, but subject of the certification system of OIML	high	“This applies in” deleted. See also AU-5.
AU-5	G 4.1.2.2-1	Edit	Please realign the text so that this clause is consistent with the rest of the document. Currently this clause reads as follows: OIML Guidance to section 4.1.2.2 (G.4.1.2.2-1) This applies in Provisions shall ensure that	Amend G.4.1.2.2-1 to read <u>OIML Guidance to section 4.1.2.2 (G.4.1.2.2-1)</u> G.4.1.2.2-1 Provisions shall ensure that	Low	Agreed.
NL-15	4.1.3	techn.	No interpretation given (as wel as for 4.1.3.1)	The use of the OIML logo shall be part of the Guidance for appropriate application	high	A project proposal for the use of the OIML and OIML-CS logos has been submitted to the CIML.
NL-16	G.4.1.3.1-1	edit.	No reference is made to the new system foreseen coming into force on 1 January 2018	Add	medium	See response to JP-1.
CA-4	4.2.6		Guidance provided does not read well.	Place “Any part of the same legal entity” in quotations so that readers can better link the guidance to the text in applicable ISO 17065 clause		Agreed.
NL-17	G.4.2.6-1	techn.	Only reference is made to impartiality for the legal entity in case of a public administration. This is insufficient, where the public administration shall fulfil the requirements of the certification body.	See G.4.1.1-1	high	Not Agreed. Current text is considered sufficient.
NL-18	G.4.3.2-1		The requirement is correct but incomplete	See G.4.1.1-1	high	Not Agreed. No additional wording proposed.

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CA-5	G.4.6-1		This section states "...type evaluation will be performed according to the International Recommendation or standard or to the national requirements, or both." There are two instances of "or" separating what appears to be 3 items, however, the sentence ends with "or both" which doesn't read well.	"...type evaluation will be performed according to either the International Recommendation, standard, to the national requirements, or to a combination thereof."		Partially Agreed. Text reworded to improve clarity.
NL-19	G.4.6-1	techn.	The type evaluation shall be in compliance with the requirements of the OIML Recommendation (compliance with part 3 of the Recommendations, national requirements. However annexes to the test report and eventually the Type Evaluation Report (clearly indicated) can be include with reference to national requirements or (ISO) standards.	"When...shall be aware or informed of the fact that type evaluation will be performed according the OIML Recommendation. The Issuing Authority is free to add annexes to the test and type evaluation report with reference to international standards or national requirements."	high	See responses to CA-5.
NL-20	G.4.6-2 G.4.6-3 G.4.6-4	techn.	Discussed during the CPR meeting of March 2016, it is suggested to include reference to documentation (documentation folder) supporting the OIML Certificate of Conformity in order to have draw up a national/regional approval. This to ensure that the national approval is based on the same type as was subject of the type evaluation performed under the OIML system.	Add in the system a reference to a documentation describing the essential parts / software of the instrument for identification.	medium	Not Agreed. This section of ISO/IEC 17065 relates to the certification body making available information regarding the certification scheme(s).
CA-6	G.5.1.2-1		Missing "a" in sentence.	"When a certification body is a service of a public administration..."		Agreed.
SE-2	5.1.3, G.5.1.3-3	techn	Note that ISO/IEC 17065 includes three levels; evaluation, review and decision. Testing and examination is part of the evaluation. A review has to be made before a decision. In case definitions are needed in this guide, they should comply with ISO/IEC 17065.	Use the same three levels as in ISO/IEC 17065.		See response to SE-1.
NL-21	G.5.1.3-2	techn.	This is not an interpretation but setting a new requirement which is not mentioned in the ISO/IEC 17065. The standard indicates clearly that the certification body shall keep supervision on the implantation of the policy and procedures (b) and on finance (c). It does not mention to have procedures to demonstrate that the policy is implemented. There are other means how this can be demonstrated.	Delete	high	Agreed. Requirement to have procedures has been deleted.

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NL-22	G.5.1.3-3	techn.	This is a wrong interpretation of the standard. The certification body appoints the evaluators and keeps supervision on the issues as mentioned under b and c. Introducing new definitions is unnecessary and unclear.	Delete	high	See response to SE-1.
NL-23	G.5.2.4-1	gen.	The establishment of a mechanism is not easy to cover all Recommendations and users/authorities. However, it might be of interest of the certification body to include.	Change “is” into “may”	low	Agreed.
CA-7	6.1.1.2		Section begins by indicating “No OIML Guidance” but then proceeds to list Guidance for this section.	Remove “No OIML Guidance”.		Agreed.
PL-3	6.1.1.2	edit.	There is a text “No OIML Guidance”, but below we can find OIML Guidance to Section 6.1.1.2	Remove “No OIML Guidance”		Agreed.
NL-24	G.6.1.1.2-1	gen.	This is not an interpretation but one of the possible approaches. The standard does not demand this approach and may be performed different.	Delete. However, the interpretation her is that the person designated by the body to perform the evaluation has sufficient knowledge of legal metrology and the specific Recommendation. The involved staff of the certification body shall have sufficient knowledge of legal metrology, especially the OIML certification system and preferably national requirements.	high	Agreed.
NL-25	G.6.1.2.1-1	gen.	D14 can be used as guidance, but not mandatory	Change “should be followed” in “can be used as guidance”	high	Agreed.
NL-26	G.6.1.2.1-3	gen.	Unclear	amend to enlighten	low	Have re-worded to improve clarity.
NL-27	6.1.2.2-1	gen.	Experience in assessments is not essential for testing and examination and not for type evaluation or decision making for certification	Delete	low	Agreed.
SE-3	6.1.2.2 G.6.1.2.2-2	techn	Note that ISO/IEC 17065 requires that records shall be maintained on the personnel involved in the certification process. In the certification process other personnel than evaluators are involved, for example reveiwers. We do not see the need to point out records only for evaluation personnel.	Add more examples such as reveiwers, decisionmakers or else delete the content of this clause.		Agreed.
NL-28	G6.2.1-1	gen.	The (primary) testing laboratory shall not only be accredited according ISO/IEC 17025, but also have the relevant Recommendation in its scope.	Include that the Recommendation shall be covered by the scope of accreditation	high	Agreed.

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NL-29	G.6.2.2.1-1	techn.	The certification body shall ensure that the subcontracted body complies with the essential requirements of the standard and the relevant scope of activities in relation to the OIML Recommendation	Change text	high	Not Agreed. Alternative text not proposed, and existing text considered adequate.
NL-30	G.6.2.2.2.2-1	techn.	According ISO/IEC 17025, subcontracted test shall be clearly indicated (location). For the OIML system it shall be clearly indicated that the test are performed by the manufacturer to assure that utilises of the OIML CS can accept or refuse (to meet legal requirements)	Add reference to the scope (to the OIML Recommendation, or standard which is mentioned in the Recommendation)	high	Agreed.
DE-3	G.6.2.2.4-2	Techn.	The evaluation should not be task of the laboratory but of the evaluator.	Replace first sentence by “In the event of a modular evaluation of different components of the instrument, one evaluator should be responsible for the final evaluation of the complete type”		Partially Agreed. See wording in 1CD.
NL-31	G.6.2.2.4-2	techn.	The issue of principal/primary laboratory is discussed several times but not defined. The person responsible for the evaluation shall be appointed by the certification body, which however may differ from the principle/primary laboratory.	Needs clarification	medium	See response to DE-3.
NL-32	G.6.2.2.4-3	gen.	Agree.	Add “and shall be subject of the agreement of the subcontract”	medium	Agreed.
NL-33	G.6.2.2.4-4	gen.	What mutual agreements are meant here? And how it the connection with the MTL in the OIML MAA system (Scheme A)	Clarify what mutual agreement is meant or delete if it has no relation to the OIML system	medium	Text added to address MTLs under the OIML-CS.
NL-34	G.7.1.1-3	edit.		Include reference to the document where sampling of stock is given	low	Not agreed. Not relevant to guidance on ISO/IEC 17065.
NL-35	G.7.1.1-5	edit.		Add : to other “national/regional” legal metrology procedures	low	Agreed.
PL-4	G.7.1.2-1(2)	edit.	Cross reference Table indicates G.1.1-2 (D29:2008) as a reference to G.7.1.2-1 (1WD).	It should be reference to G.7.1.2-2		Noted.
NL-36	G.7.2.1 and 2	gen.	For the OIML CS the OIML Recommendations and documents produced and approved by the Management Committee are applicable, not laws or standards). Only standards that are related to the OIML CS as ISO/IEC 17065.	Delete parts that relate to other documents than OIML Recommendations and OIML CS documents	high	Agreed. Wording changed.

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NL-37	G.7.3.1-1 & 2	gen.	The review – in the scope of OIML – shall review the capability of the (sub)contractor in the frame of the specific OIML Recommendation	eligibility of the type of instrument for certification for the specific Recommendation Capability of the certification body and of its subcontractors for performing the tests according the requirements as mentioned in the OIML Recommendation, and its specific mentioned standards. Delete legislation	medium	Partially Agreed. Reference to OIML Recommendations included.
NL-38	G.7.4.1-1	gen.	The OIML certification body is responsible for the evaluation.	Delete evaluation body (not defined)	high	Partially Agreed. Evaluation body changed to national issuing authority
FR-4	7.4.4-1	techn	Provision concerning the recognition of tests submitted by the manufacturer and implemented before its application could be added, especially if it is foreseen to forbid such recognition in the frame of OIML type evaluation			MTLs are permitted under the OIML-CS. Acceptance of MTL results is outside of the scope of this document.
NL-39	G.7.4.4-1 2 and 3	techn.	The description is limited to what is prescribed for MTL It is the responsibility of the manufacturer to demonstrate compliance with the requirements. Witnessing of modifications can be made at factories in other regions than were the laboratory is settled. Calibrations may be required before or after the type approval process.	Make reference to documents related to MTL Change certification body shall demonstrate into manufacturer shall demonstrate Delete: the certification body or the designated laboratory shall witness them to be sure that they conform to the authorization of the certification body Add: <i>During the type examination process...</i> the manufacturer is not authorized to perform any adjustment and/or modification out of this supervision without supervision of the certification body.	medium	Partially Agreed. See wording in 1CD.
NL-40	G.7.4.9-1	edit.	Correct use of wording	of OIML <i>Test</i> Report Formats for the OIML Certificate System	medium	Agreed.
NL-41	G.7.4.9-5	gen.	Delete names evaluators and of the supervisor	names of the observer	medium	Section deleted.
CA-8	7.6		The breakdown of subsections in 7.6 are not shown but rather all grouped together under 7.6.	Add Sections 7.6.1, 7.6.2, 7.6.3, and 7.6.4 and associate relevant Guidance (i.e. G.7.6-1 to G.7.6-3) to the appropriate subsections.		Agreed.
NL-42	G.7.8-1	gen.	Different approaches are used to register the certificates.	Delete: However, it is the responsibility of the OIML Issuing Authority to provide the BIML with copies of the OIML Certificates issued and to check whether the database is up to date. Add: Only registered certificates are valid	Medium	Agreed.

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NL-43	G.7.9.1-1	gen.	Surveillance is not required in the OIML Certificate System is incorrect wording	Change to Surveillance on products in use is not covered by the OIML Certificate System	Medium	Agreed.
JP-6	7.10		On OIML type evaluation, OIML Recommendations for each measurement instruments are revised with different document number when requirements are changed. Then, a change of OIML Recommendation requires new OIML certification. Consequently, “changes affecting certification” due to change of requirement on products does not occur.	Change to 7.10.1 Not applicable for OIML certification		Not Agreed. See response to FR-5.
FR-5	7.10.1	techn	A reminder of the provisions of § 9.3 of OIML B3 could be relevant.			Changes specified in OIML B 18 included as examples.
DE-4	G.7.10.2-2, 3 rd bullet, Example	Techn.	Depending on the definition of the “manufacturer” in the national regulation, such extensions to other manufacturers might be impossible.	Limit example to OIML certification		Agreed.
NL-44	G.7.11.3-1 & 2 G.7.11.6-1	gen.	For OIML Certificates, in the event that an OIML Certificate is terminated, suspended or withdrawn the Issuing Authority shall notify the BIML so that the registration of the OIML Certificate can be amended accordingly on the OIML website.	There is no system in place on suspending or withdraw of certificates. National authorities may have issued national approval on these certificates. Withdraw may cause invalidity of the national approval and withdraw of products of the market in a country/region.	Medium	Not agreed. OIML Certificates can be deregistered as detailed in PD-01.
NL-45	G.7.12.3-1	edit.	There is no validity period given on OIML certificates	Delete	Low	Not agreed. This guidance document relates to the assessment of any certification body in legal metrology, e.g. those issuing national/regional approvals, not just those issuing OIML certificates.
NL-46	G.7.12.3-2 G.8.4.2-1	gen.	Records related to OIML Test Reports shall be kept available as long as the OIML Certificate remains registered.	By whom and there is no period of registration given	Medium	Proposal that these are kept by the OIML Issuing Authority.
NL-47	G.7.9.1-	gen.	some cases, appeal procedures may be the responsibility of regulatory designating authorities. However, they must be described	It is a requirement that Certification body shall have an appeal procedure, also public administrations. The new OIML SC has a appeal procedure	High	See response to JP-1.
PL-5	7.13.1	edit.	Incorrect numbering, it should be 7.13.1-1 instead of 7.9.1-1 The same in Cross reference Table.	Renumbering/correct numbering		Agreed.
PL-6	8	edit./ techn	I propose to consider to add an explanation in purpose to avoid confusion in relation to the Scheme A and B in the new system (CS).	If my proposal will be accept – please add an explanation		Agreed.

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NL-48	G.8.2.4-2		Duplication of requirement of the standard	Delete to avoid contradictions. Be specific if this differs or is required for legal metrology	Medium	Not Agreed. Existing text does not duplicate the wording in section of 8.4.2 of ISO/IEC 17065.
CA-9	8.4.2		Section begins by indicating “No OIML Guidance” but then proceeds to list Guidance for this section.	Remove “No OIML Guidance”.		Agreed.
PL-7	G.8.6.2-1	gen./ techn./	My question is, which requirements shall be taken into consideration? I assume that this issue should be resolved when document will be align to CS. This section refers to the Publication B10. (D29:2008 does not cover guidance concerning the Internal Audits (4.7 - D29:2008)).	Remove G.8.6.2-1 or reformulate G.8.6.2-1 with a view to G.8.6.3-1. (See below)		See response to JP-1.
PL-8	G.8.6.3-1	gen./ techn./	Almost the same sentence as in G.8.6.2-1. See also comment above.			See response to JP-1.
CA-10	Various		Various elements of this guidance document have formatting that does not left align text for some of the clauses. Examples of this include in: <ul style="list-style-type: none"> • G.4.2.6-1 • G.5.1.2-1 • G.5.1.2-2 • G.5.1.3-1 • G.5.1.3-2 • G.5.1.3-3 • G.5.2.1-1 • G.5.2.4-1 • G.6.1.2.1-3 • G.7.7.1-1 	Correct alignment to be consistent with rest of document.		Agreed.
NL-49	general		As mentioned under G.4.1.1-1, a public administration - or similar situations - should comply with the requirements as set for a (commercial) certification body, however the interpretations - like financial independency – may differ from a commercial body. Nevertheless, the requirements of ISO/IEC 17065 shall be met. For that reason I propose to distinguish in this document the commercial and public Issuing Authorities and to identify the specific interpretations for these cases (so one chapter for interpretation with the OIML and one chapter how to make interpretations as public administration). This would make the purpose of the document more dedicated and clear.	Change the document in a way that the interpretations are related to the OIML system, not national laws or other standards.	High	Wording throughout the document has been modified where possible/necessary to clarify that the Document relates to the issuing of national type approvals and the issuing of OIML Certificates.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
NL-50	general		With the implementation of the new OIML CS (based on ISO/IEC 17065), I propose that this document will be reviewed and maintained by the Management committee of the OIML CS.	Review by the MC of the OIML CS	Medium	Not agreed. As this is a D publication it must be developed in accordance with OIML B 6 under the TC/SC/PG structure. However, the Convener of the project is also the Executive Secretary of the OIML-CS so the Management Committee will be kept informed of the development of this Document. Consideration to be given as to how MC could contribute to this project and to provide comments.
NL-51	general		The document should not give requirements but guidance in relation to legal metrology. The document shall not give new definitions as supervisor or evaluator, nor prescribing the need of procedures.	Delete requirements (as procedures)	High	Agreed.