



OIML Seminar on Conformity to Type (CTT)

29-30 June 2011, Utrecht, the Netherlands

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Background to Conformity to Type (CTT) in OIML

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Overview

- Metrological Control Systems
- Initial drivers for OIML CTT activity
- 2004 proposal for linking to MAA
- Presidential Council WG on CTT
- More recent activity on CTT
- Critical issues identified
- Options for OIML involvement
- Summary

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Metrological Control Systems

A national (OIML) standard

Pattern (type) approval (C of T)

Conformity to type (CTT)

Verification test procedures

Initial verification

Subsequent verification

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Initial Drivers for OIML Activity

- Advent of electronic instruments means that initial verification is no longer able to detect non-conformances with the specifications for the pattern.
- Accidental discoveries in Australia
 - load cells lack of temperature compensation
 - NAWI instruments with different power supplies
 - EMC components missing
- Voluntary CTT system in Australia
- Issues with evidential breath analysers
- Analysis of pattern approval applications

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Initial Proposal for Linking to MAA

- 2004 CIML discussion on MAA fees
 - Discussion of MAA fees with a component for issuing authorities and a fee on each certificate.
 - Noting the savings for industry in approval fees, it was proposed to incorporate a mandatory loading on MAA certificates to fund a CTT system
- CIML rejected this proposal because it did not want to compromise the acceptance of the MAA.

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Presidential Council WG on CTT

- Presidential Council established a WG on CTT in 2005.
- Meetings were held annually until 2008
- At CIML 2010, CIML considered a proposal to create a new technical committee on CTT. However, CIML resolved instead to hold this seminar.

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Outcomes of WG on CTT

- Meeting 1 in 2005: There was strong support for developing a CTT proposal, involving:
 - International coordination,
 - Sharing of information on non-conformities through an “alarm” database,
 - It was noted that the latter could raise confidentiality and legal issues.
- Meeting 2 in 2006:
 - The meeting considered in detail a discussion paper that the secretariat had prepared for the meeting.
 - It was resolved to carry out surveys of industry and regulators.

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Outcomes of WG on CTT (2)

- Meeting 3 in 2007:
 - The two surveys conducted by BIML were considered.
 - The survey of regulators revealed that few member states had a competent system to detect non-conformities. Most relied on initial verification that can detect blatant non-conformities but is mostly ineffective for CTT.
 - About a third of respondents to the industry survey were opposed to the introduction of an OIML conformity to type program. The remainder either supported such a program or had no opinion.
- A presentation by a representative of CECIP was strongly supportive of a conformity to type program. The representative noted that some major European manufacturers were considering the introduction of their own voluntary program.

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Outcomes of WG on CTT (3)

- Meeting 4 in 2008:
 - The meeting considered an issues paper prepared by the secretariat.
 - The representative from CECIP informed the WG that European manufacturers were supportive and open to the idea of a CTT program.
 - The representative from the USA informed the WG of a “Proof of Production vs. Type” program that had recently been established by the Scale Manufacturer’s Association in America. This program incorporates initial verification, an administrative (certificate) review and conformity testing.
 - In addition, some representatives informed the WG that several manufacturers have approached them requesting a higher level OIML type approval (OIML ++) incorporating CTT.

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More Recent Activity on CTT

- At CIML 2009, a Round Table on Metrological Control was held in which some papers were presented on CTT.
- Also in 2009, the BIML prepared a discussion paper on Conformity Assessment of Measuring Instruments (BIML 09 N° 402/JFM) that also raised the application of CA to prepackages.
- At CIML 2010, CIML considered a proposal to create a new technical committee on CTT. However, CIML resolved instead to hold this seminar.

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Outline of the CTT System Considered by WG

- Recognition of manufacturers' quality systems based on certification by an IAF signatory. Note that some national authorities already require auditing of the manufacturers quality system (similar to Annex D of MID).
- A light level of auditing of production possibly in cooperation with Regional Bodies. Further auditing would be carried out if a significant non-conformity were detected.

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Critical Issues Identified

- Funding of CTT testing. Although not a large amount of funding is required because:
 - Only a few instruments sampled from any region
 - Only a subset of approval tests carried out
 - (some ideas on funding will be presented later in the seminar)
- Confidentiality and legal issues. The storage and transmission of information that impacts negatively on a company is a very significant issue and BIML would need to take legal advice.

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Options for OIML Involvement

- No involvement.
- Establish a TC to prepare a guidance document for member economies with no further involvement
- Establish a TC to develop an MAA type system with BIML coordination and transmission of testing data
- As for the last dot point but including conformance of prepackages.

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Summary

- With technological development, there is a clear need for a conformity to type (CTT) system.
- Industry has in general been supportive.
- To make further progress, the OIML WG and seminar activities need to be replaced by formal technical committee work.
- There are legal, confidentiality and funding issues to be addressed.

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