



**OIML Seminar on Conformity to Type (CTT)**

**29-30 June 2011, Utrecht, the Netherlands**



**OIML Seminar on Conformity to Type (CTT)**

Perspectives of manufacturing industry



Content:

- About CECIP
- Role and responsibilities of manufacturers in the European market under legal control
- Questions to a voluntary quality management system for production (QMS) under supervision of OIML

About CECIP:

Members are the 15 national associations of weighing industry from the following countries:

Austria	Poland
Czech Republic	Romania
France	Russia
Germany	Slovak Republic
Hungary	Spain
Ireland	Switzerland
Italy	United Kingdom
Netherlands	

## About CECIP:

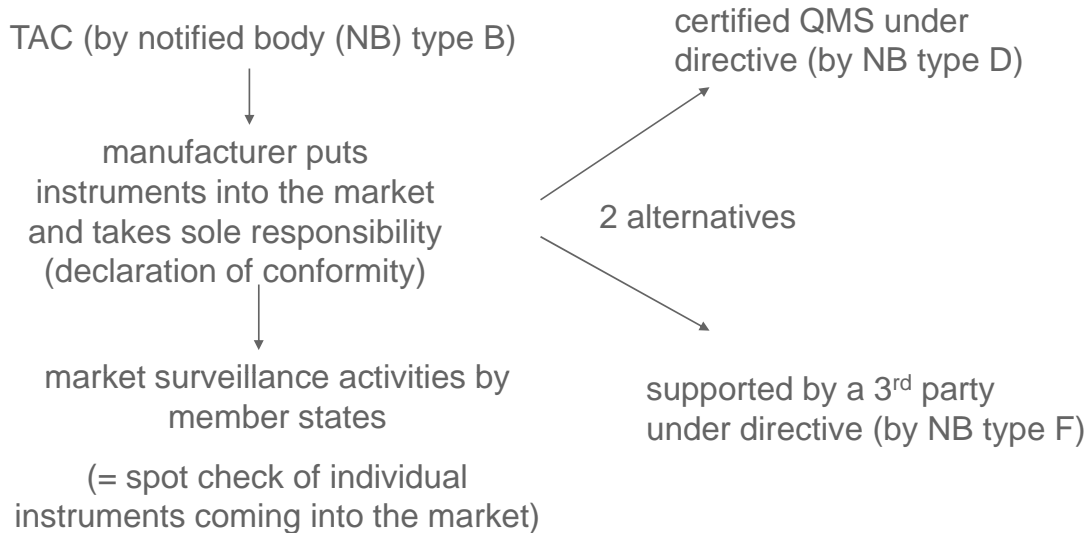
- 700 manufacturers
- turnover 3 billion Euro in 2008
- 50.000 employees
- + 4000 – 5000 micro companies (10.000 employees)
- global markets with more than 50 % of world wide trade volume

## Role and responsibilities of manufacturers in the EU market under legal control

### General overview:

- two-tier system : private and legal metrology
- harmonisation of regulations and cross approval of certificates and QMS certification between member states in EU resp. EEA via EU directives (one certificate is legal for all member states)
- legal metrology: 2 measuring instruments directives (NAWID and MID)
- legal metrology: same requirements for instruments' production inside or outside of Europe

Role and responsibilities of manufacturers in the EU market under legal control  
procedure for putting instruments into the market:



Role and responsibilities of manufacturers in the EU market under legal control  
procedure for putting instruments into the market:

“certification of QMS” means:

checking whether a manufacturer has set up suitable procedures for manufacturing, testing and tolerances to make sure that his instruments will be in conformity with the regulations.

“certification of QMS” does not mean:

Testing of individual instruments by the NB. That might be the case in very special cases only. Such may be done with spot checks by the market surveillance bodies.

## Role and responsibilities of manufacturers in the EU market under legal control

Essential functions of the system:

- **law based system with legally defined consequences in case of non-compliance**
- legally based market surveillance to grant fair competition (certified QMS is an alternative but not mandatory)
- information exchange between market surveillance bodies of member states monitors non-compliances

## Role and responsibilities of manufacturers in the EU market under legal control

Experience of manufacturers

- since 1993 with NAWIs under NAWI directive
- since 2006 with AWIs under MID

Added value for manufacturers having a certified QMS e.g.:

- time to market (instruments may be put into use immediately because no additional actions are necessary (e.g. no initial verification by a 3<sup>rd</sup> party/W&M))
- reduction of costs when testing in production only without repetition by a 3<sup>rd</sup> party/W&M

## Voluntary QMS under supervision of OIML

General remarks:

CECIP supports quality and fair competition.  
Therefore CECIP supports conformity to legal requirements in  
general and on a high level!

To judge whether a voluntary OIML CTT would be an advantage  
there are **many questions which have to be answered before.**

## Questions to a voluntary QMS under supervision of OIML

1. A manufacturer wants to import instruments into EU. What is the  
benefit of his certified OIML CTT QMS?

??? EU has established its own legal system

=> the manufacturer has to use a Notified Body of EU for certification  
of his QMS instead/in addition in case he wants to put his  
instruments into the market via certified QMS

2. A manufacturer wants to import instruments into the US using  
NTEP CC. What is the benefit of his certified OIML CTT QMS?

??? NTEP has established its own system with VCAP

=> ???

Questions to a voluntary QMS under supervision of OIML

3. A manufacturer wants to import instruments into other countries of the world where a “legal” system is not yet in place. What is the benefit of his certified OIML CTT QMS?

??? Has to be identified.

4. A manufacturer wants to import instruments into EU, US and other countries of the world (item3).

**Does he has to be certified by at least all 3 organisations in parallel ????????**

Questions to a voluntary QMS under supervision of OIML

5. Other questions :

Does certification under the CTT mean

- checking procedures in production or
- checking of compliance of instruments coming out of production
- or something else?

What does compliance (e.g. demonstrated by a sticker) say when the requirements are not harmonised in the countries taking part? See OIML R76 for example. There are differences and specialities in several countries.

Questions to a voluntary QMS under supervision of OIML

5. Other questions :

What are the requirements to instruments which are type-approved in a country without using OIML certificate and OIML CTT? How are those instruments or QMS under supervision to grant fair competition?

OIML has no legal rights in countries. How can OIML achieve legal consequences to achieve fair competition in a country in case of non-compliances?

Questions to a voluntary QMS under supervision of OIML

5. Other questions :

- What could be the consequences at all when OIML detects non-compliance and a national TAC is already issued? OIML certificates and OIML CTT have no legal character in any country.
- How to detect non-compliance for instruments without OIML certificate at all?
- Are users willing to pay the costs for instruments produced under a voluntary CTT in case others can produce cheaper without that? Not joining the CTT and saving costs doesn't say that produced instruments are not in compliance.

**•Where is the benefit for a manufacturer to join the OIML CTT (return on investment for his additional costs)?**



Questions to a voluntary QMS under supervision of OIML

These questions and others have to be answered

because

**to make the idea successful is that all parties  
involved in the system have to be convinced  
and see a benefit for the future**

**Thank you for attention**

