

FINAL DRAFT  
BASIC PUBLICATION

51st CIML Meeting

Strasbourg 2016

INFORMATION

---

Framework for the OIML Certification System (OIML-CS)  
(Information)

Version 2 (2016-09-13)

Cadre pour le Système de Certification OIML (OIML-CS)  
(Information)

---





## Result of CIML online voting

### OIML B xx: Framework for the OIML-CS

CIML Preliminary online ballot

Deadline: 2016-06-17

**Votes cast: 28 (Yes: 23 – No: 5), 4 abstentions, Did not respond: 28<sup>1</sup>**

AUSTRALIA	Voted No on 2016-06-17 (With comments)
AUSTRIA	Voted Abstain on 2016-06-17 (With comments)
BELGIUM	Voted Yes on 2016-06-09
BRAZIL	Voted Yes on 2016-06-14
CANADA	Voted No on 2016-06-17 (With comments)
CHINA	Voted Abstain on 2016-06-17 (With comments)
CROATIA	Voted Yes on 2016-05-18
CYPRUS	Voted Yes on 2016-06-16
CZECH REPUBLIC	Voted Yes on 2016-06-13
DENMARK	Voted Yes on 2016-04-19
EGYPT	Voted Yes on 2016-06-16
FRANCE	Voted Yes on 2016-06-16
GERMANY	Voted Yes on 2016-06-17 (With comments)
JAPAN	Voted No on 2016-06-17 (With comments)
KAZAKHSTAN	Voted Yes on 2016-06-02
KOREA (R.)	Voted Yes on 2016-06-17
MONACO	Voted Yes on 2016-04-19
NETHERLANDS	Voted Abstain on 2016-06-17 (With comments)
PAKISTAN	Voted Yes on 2016-05-11
POLAND	Voted Yes on 2016-06-13 (With comments)
PORTUGAL	Voted Yes on 2016-06-14
ROMANIA	Voted Yes on 2016-05-24
RUSSIAN FEDERATION	Voted Yes on 2016-06-16
SERBIA	Voted Yes on 2016-06-17
SLOVAKIA	Voted Yes on 2016-06-16
SLOVENIA	Voted Yes on 2016-04-26
SPAIN	Voted No on 2016-06-17 (With comments)
SWEDEN	Voted Abstain on 2016-06-17 (With comments)
SWITZERLAND	Voted Yes on 2016-06-09 (With comments)
TURKEY	Voted Yes on 2016-06-16
UNITED KINGDOM	Voted Yes on 2016-06-06 (With comments)
UNITED STATES	Voted No on 2016-06-17 (With comments)

---

<sup>1</sup> Thailand was not a Member State when this ballot was put online (total 60)



Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
AT			Austria abstains because the proposed changes in the OIML Certification System could be too expensive for smaller members.			Noted.
AU			<p>Australia votes 'No' due to the following reasons:</p> <p>There appears to be some issues with the governance of the Management Committee, specifically in relation to the development and approval of documents regarding the operating procedures and decision making of the Management Committee. It is Australia's opinion that CIML should have the authority to approve the higher level operational arrangements of the Management Committee, e.g. voting rules.</p> <p>Specifically please see our previous comment in relation to clause 9 of the draft OIML B xx 7e Framework for the OIML-CS copied below for convenience.</p>			It is essential that MC has the autonomy to make decisions regarding the operation of the OIML-CS and the associated documentation to ensure operational effectiveness of the MC. CIML will have oversight of the OIML-CS and MC decisions through the annual reports to the CIML.
CAN	GEN	GEN	<p>B xx framework is contingent on the development of supporting documentation. For example:</p> <ul style="list-style-type: none"> <li>•Section 6 (Governing Documents) says rules of procedure will be developed, maintained and approved by the MC</li> <li>•Section 11 (Management Committee) – includes a number of responsibilities to develop guidance, policy and clarify roles and responsibilities</li> <li>•Section 14 (Board of Appeal) procedures to be developed</li> <li>•Section 15 (Conduct of Work) both state that the details will be included in management committee operational documents</li> </ul>	Suggest voting on B xx only once greater details are made available for discussion and review.		Draft operational documents and procedural documents will be circulated to the CIML with the final draft of B xx as per the CIML approved timeline.
CN			China supports CSPG to establish the new framework for CS system. And we also noted that Chinese comments on the CS-System documents have been accepted.			Noted
CN			But we think that some main documents on CS-System have been not developed.			Draft Operational and Procedural documents will be provided with final draft of B xx.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
CN			In addition some issuing authorities and most of testing laboratories need much time to prepare.			Noted
JP		Gen	We deeply appreciate great efforts by CSPG chaired by Dr. Roman Schwartz to restructure current OIML Certificate Systems. We support proposed transition to the new OIML-CS as well as the project to draft the new Basic Document Bxx. However, the present draft seems to be too premature as a framework document for OIML-CS. This draft should be examined and revised further through the discussions in the CSPG and CIML.	(none)		The Framework document has been developed by the CSPG in accordance with the CIML approved timeline. Draft Operational and Procedural documents will be provided with final draft of B xx.
NL		gen	Excellent work has been done on the development of this document, including thorough elaboration of the comments from the experts.			Noted.
NL		gen	In the observation of the convener is mentioned that a number of MC procedures have to be developed. The member states experience the development of these documents as crucial for voting on the system. The present system is limited to a few Basic publications (B3 and B10) and a CPR for three Recommendations and a limited number of participants. Participants have a good view on the competence of the Issuing Participants based on a long lasting relationship. In most cases the Issuing Participants have a bilateral agreement already established prior to the MAA system. It is the intention of the OIML-CS to have a better functioning of the system, increasing the number of participants and widening the scope with other Recommendations. This new Basic publication installs the framework of OIML- CS only, not the underlying documents. Voting and approving this draft publication can be seen as approving the system, including the underlying MC procedures which are to be developed. Voting on this document can be experienced as binding to a system where the responsibilities and obligations of the members are not clear. Utilizers which are responsible for approving instruments to enter their national markets may hesitate to approve this draft due to obligations which will be unknown. This may hinder the acceptance and further development of the system	Make clear to the member states that this draft publication is the outline of the system. Further development will follow on the procedures in the near future and eventually may lead to adjustment of this framework if needed. Approval of the CIML members is needed on the MC procedures, and eventually a revision of this publication if needed. Involvement in the development will improve acceptance and participation in the system significantly.	High	Draft operational documents and procedural documents will be circulated to the CIML with the final draft of B xx as per the CIML approved timeline.  It is proposed that there will be a meeting of the CSPG on 23-24 August 2016.  It is essential that MC has the autonomy to make decisions regarding the operation of the OIML-CS and the associated documentation to ensure operational effectiveness of the MC. CIML will have oversight of the OIML-CS and MC decisions through the annual reports to the CIML.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
NL			A lot of intensive work has been done by several members of the AHWG to have the draft ready before the upcoming CIML and Conference meetings. Some participants in the AHWG are only limited involved during the development of the document. Not all steps of the OIML B 6 are followed. This contributes to the uncertainty of member states to accept the draft.	Develop the MC procedures according B 6 in order to allow a better involvement of the Member States.	High	The draft of B xx has been developed in accordance with the CIML approved timeline. The CSPG will be provided with the final draft of B xx, along with the working drafts of the Operational and Procedural documents.  It is proposed that there will be a meeting of the CSPG on 23-24 August 2016.
NL		gen	<p>The OIML (Basic) Certification system was established in 1991, followed by the MAA in 2005. The now called Basic system can be accepted on voluntary basis by any authority, where the MAA provides in uneventful acceptance among the participants based on trust. The participation of member states in the MAA system is limited and in general already covered by bilateral agreements. Extension of the system is limited. The global acceptance of Basic and MAA certificates is relatively unknown.</p> <p>Introducing a new system needs trust among the participants. Also creating trust of new Issuing Participants that step into the OIML- CS, especially when these come from less stronger economical areas. It is obvious from the voting and comments that there is not a uniform understanding of the system and lack of view on the contents of the MC procedures to be developed. This even accounts for some of the AHWG members involved in the development of this draft.</p>	During the Milestones in Metrology in Amsterdam 2016, Darel Flokken presented the development of the national system in the US in comparison with the OIML-CS, where every state was visited and discussed for participation: “to create acceptance and better understanding by visiting different States in small groups of stakeholders to discuss, understand and create better acceptance and understandings in the long term.”	High	<p>It will be the responsibility of the MC to improve the operation, effectiveness and acceptance of the new system. Consultation with stakeholders, interested parties and potential users of the system will be an important tool in supporting this. The Operational Document for the MC will detail the requirements.</p> <p>In accordance with CIML Resolution No. 2013/15, all available means will be taken to improve the awareness and acceptance of the OIML-CS.</p>

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
NL		gen	Utilizing Participants are responsible for national approval of instruments for their local/regional markets. It is the main task and responsibility of these utilizer to ensure that no non complying products are entering the market. The system does not foresee in clauses to which Utilizers can apply when doubting the compliance of the measuring instrument with the Recommendation and/or national requirements. The system makes the acceptance of the Certificate with appertaining evaluation/test report obligatory. This approach may introduce the risk that Utilizers will not participate or withdraw at the moment that there are doubts on compliance. This may especially concern the conformity to type approach (production) while this is not covered by the OIML-CS.	Provide in clauses that can be applied by Utilizers (users) in case of doubt. Leave the responsibility of rejection at the responsible authorities (reporting arguments for non-acceptance in order to prevent for misunderstandings). This will improve participation.	High	Agree, wording from 13.3 of B 10 will be included in the Operational/Procedural documents as appropriate. For transparency, it is proposed that the reasons for non-acceptance will have to be provided to the MC.
NL		gen	<p>After the MAA establishment during the CPR meetings, several shortcomings in were observed OIML B 3 and B 10. The functioning of the CPR needed to be improved. Looking at the involvement of persons in the MAA system the conclusion is that this is rather limited. Participation of Issuing Participants and Utilizers in the meetings is limited. Email voting time for new participants may count up to more than one year, which hinders the new members to participate. On the other hand, participants that did not issue a OIML certificate for whatever reason, do not invest in meetings and reporting.</p> <p>Having a more sophisticated system does not guarantee improvement of functioning as what has been achieved in the present CPR. Looking at the number of experts available for peer assessments or participation in the accreditation assessments it shows that this is limited to only a few persons. Approximately 80% of the certificate are produced in EU, while the global acceptance of certificates is unknown. The further is the need to distinguish Basic or MAA certificates.</p> <p>The establishing of the new system (meeting international standards) does not better guarantee the functioning and acceptance of the system. The system can be experienced as buckram due to its regulations and committees, while the number of certificates globally needed is limited in comparison to the IEC Certification system.</p>	Pro active plans and actions are needed to involve potential participants.	High	The MC and Executive Secretary will be responsible for the implementation of proactive plans and actions to improve potential participation.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
NL		gen	The application of the present certification system differs per member state. Where OIML Basic certificates could easily be accepted for national approval, several may demand additional requirements or even additional testing. Others do not accept OIML certificates, neither Basic nor MAA	Make a survey among the member states (including associates) to understand the legal or technical obstacles / barriers to participate in the OIML-CS, or to accept OIML certificates even without participating in the system. Provide assistance on governing level to overcome these barriers where needed and possible. Apply a pro active approach to potential participants or users of the OIML-CS.	High	Results of existing surveys can be used by the MC to improve the operation, effectiveness and acceptance of the new OIML-CS. See also comments above regarding further consultation.
US		Gen	A meeting of the full CSPG should have been held to discuss several key issues before sending the Draft OIML B xx Framework for OIML-CS to the CIML for Preliminary Ballot.	Do not put Draft OIML B xx Framework for OIML-CS on the CIML meeting agenda for vote, only for discussion.	1	Noted. It is proposed that there will be a meeting of the CSPG on 23-24 August 2016.
VN			It is not clear whether the new basic Publication "Framework for the OIML Certification System (OIML-CS)" will replace both documents OIML B 3:2011 OIML Basic Certificate System for OIML Type Evaluation of Measuring Instruments and B 10:2011 Framework for a Mutual Acceptance Arrangement on OIML Type Evaluations.  - If it does not replace both documents, both publications B 3:2011 and B10:2011 should be reviewed concurrently with this new publication for consistent use of terms and references.  - If OIML-CS replaces both documents, CIML member countries should be given time and guidance to adjust to such change before any enforcement of the new system.	No Proposed change	Medium	Noted. The OIML-CS will replace B 3 and B 10. It is intention that a transition document and other guidance will be provided.
US	Foreword	Gen	The sentence "This publication – reference OIML B xx, edition 20XX (E) – was developed by the OIML Certification System Project Group" should have been augmented to reflect and document that the OIML Directives (B6) were not followed by the Project group in bringing the draft to the Preliminary Ballot stage. Sending this draft to the CIML for vote as a Preliminary Ballot is now confusing and misleading, since the CIML Members are used to receiving a Preliminary Ballot only on complete documents that have first been fully discussed and vetted by a Project Group using the times and rules in B6.	"For historical record, this publication – reference OIML B xx, edition 20XX (E) – was developed by the OIML Certification System Project Group using an expedited process that did not follow the review times or all of the steps specified in the OIML Directives (OIML B6-1:2013)."	1	CIML Resolution No. 2015/17 instructed the CSPG to develop this document in accordance with the CSPG Terms of Reference approved by the CIML in 2015.



Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
JP	1.1	Gen	Although it is expected that B 3 and B 10 would be withdrawn after Bxx is published, most of the practical and operational rules in these documents are omitted in Bxx. Are these rules included in another document referred as “MC operational document”? However, the first draft of this document has not been circulated. The draft or the outline of the operational document is indispensable for all CIML members to evaluate Bxx adequately in the CIML preliminary ballot.	An explanation of the MC operational document is needed in Bxx.		The Framework document has been developed by the CSPG in accordance with the CIML approved timeline. Operational and Procedural documents will be provided with final draft of B xx.  Propose to expand the wording of section 6 to better explain the nature of the supporting documents.
NL	1.1	gen	Will certificates issued under the new OIML-CS be distinguished from OIML Basic MAA system (like Basic and MAA are now distinguished by the OIML logo)?	Elaborate on MC procedures	Medium	The numbering system will follow the existing system. It is suggested to keep the MAA logo to distinguish between A and B certificates.
NL	1.1	gen	The OIML-CS replaces the present Basic and MAA system (B 3 and B 10). US commented on what the status is of the Basic certificates. The reply in the observations column is that Basic certificates are not part of the OIML-CS, which is correct. However, is it possible to transfer the Basic or MAA certificate to an OIML-CS certificate? Manufacturers may need this to obtain acceptance on who will participate in the new system. In other words, can a IP draft an OIML Evaluation Report and Certificate of Conformity based on the available test results issued under the present Basic or MAA system (obtained under ISO/IEC 17025 accreditation or peer assessment)? This to avoid retesting.	Elaborate on MC procedures	Medium	It is important not to undermine confidence in the new OIML-CS. The general rule will be to not accept test results from Basic certificates when issuing Scheme A certificates. To avoid unnecessary retesting, where possible, it will be for the MC to define the policy for the acceptance of test results on a case by case basis where suitable evidence can be provided. Advice can be sought from the AP.
US	1.1	Tech	This document still doesn’t specify what the status will be of the previously issued Basic Certificates. The CSPG Convener has responded to an earlier comment that “Previous Basic certificates will not be part of the OIML CS.” We do not recall a valid decision of the CSPG to drop previous Basic Certificates from the OIML-CS. This is a serious issue that should have been discussed at a full CSPG meeting before moving Draft OIML B xx Framework for OIML-CS to the CIML for Preliminary Ballot.	Do not put Draft OIML B xx Framework for OIML-CS on the CIML meeting agenda for vote until this and other important issues can be discussed at a full CSPG meeting.  Eventually, add a Section 16.7 that explicitly covers the outcome of a vote about what the status will be of previously issued Basic Certificates.	1	Noted. It is proposed that there will be a meeting of the CSPG on 23-24 August 2016.  The Basic system will not continue, however existing certificates issued under the Basic system will remain valid and it will be for utilisers/users to decide whether or not to accept them. This will be detailed in a new clause in section 16 of B xx.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
NL	1.2	gen	In addition to the comments of ES. The OIML does not foresee in a Conformity To Type program. However, manufacturers can provide in a regional/national CTT certification on voluntary basis (e.g. EU NAWID/MID Module D or US VCAP)	Suggestion to take into account in the MC procedures. Suggestion to change the wording of moral obligation that it is the responsibility of the manufacturer to demonstrate CTT to the Utilizer.	Low (depending on the users for acceptance of the system)	Delete the sentence beginning “Nevertheless, ...” and the Note.
UK	1.2	Techn	The sentence “Nevertheless, when a manufacturer has obtained an OIML Certificate, it has a moral obligation to produce instruments that conform to those submitted for type evaluation” is a very weak formulation for dealing with the “conformity to type” issue. Moreover it is not clear that an OIML Document can place an obligation, moral or otherwise, on a manufacturer.	Either substitute the sentence with “In addition, an issuer of an OIML Certificate may itself impose an obligation to produce instruments that conform to those submitted for type evaluation” or delete the sentence altogether.	Medium	See NL 1.2.
US	1.2	tech	A “moral obligation” may not be sufficient for the OIML-CS. All EU Directives require a first party declaration that the production instruments meet the requirements.	Consider developing a requirement that the OIML CC owner shall, at a minimum, develop a manufacturer’s or supplier’s declaration of conformance (17050 Parts 1 and 2) and documentation that production instruments meet the certified type. Note that we are not proposing an OIML CTT program, but rather are suggesting that a first party declaration of conformance be required and that documentation be provided that <u>current production instruments meet the certified type.</u>	2	See NL 1.2.
US	1.4, 6 b, 11.4 k&l, 14.4, 15	gen	There are several places in this draft of Bxx referring to MC (operational) documents which have still not yet been drafted. While the delay for this is well-understood, it nonetheless remained difficult for PG members to make a decision about what belongs in this Bxx document and what belongs in the MC documents without seeing at least a first draft of the MC documents. Therefore CIML Members are being asked to vote on a document that several PG members found to contain insufficient detail, and that still contains insufficient detail.	Delay ‘voting’ on this Bxx document until a draft of the MC documents is available.	1	The Framework document has been developed by the CSPG in accordance with the CIML approved timeline. Operational and Procedural documents will be provided with the final draft of B xx.  It is proposed that there will be a meeting of the CSPG on 23-24 August 2016.
JP	2 b)	Edit	It is difficult to understand this section.	We cannot propose alternative sentences.		Wording will be modified to improve understanding.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
SE	2	Gen	When the MAA was discussed, Sweden was of the opinion that it was not necessary to build a certification system as long as there exists certification under accreditation that is accepted worldwide. We are still of that opinion.			Noted.
SE	2		According to the draft one of the objectives of the OIML-CS is “to promote the global harmonization, uniform interpretation and implementation of legal metrological requirements for measuring instruments and/or modules”. For certain instruments this is for European member states not possible or needed as we have harmonized requirements and procedures in the Measuring instruments directive and Non-automatic weighing instruments directive.			Noted. However, it is intended that the OIML-CS will have a much wider scope which goes beyond the NAWI Directive and the MID.
DE	3.	Gen	The list of terminology is shorter than the one used in OIML B 3 (or B 10). Some of the terms used in the document are not defined or mentioned here.	We suggest to add at least the definitions of the terms “family” and “module” and a general reference to OIML V1.	high	Terminology will be reviewed to ensure that all terms are included.
US	3.1, 3.6, 3.14, 5.3, 5.4, 5.5, 13.1, 16.6	gen	There are several Sections referring to “Declaration”, but it is felt that a separate Section in the Bxx is required before the Bxx draft can be considered to be complete. The definition of Declaration in Section 3.6 is insufficient for covering all of the different aspects. The part of the definition “... accepting to abide to the rules ...” does not convey the important aspect that a Utilizer or User still has the right under the Declaration/OIML-CS to not accept test data that is questionable, and is entitled to seek clarification and possibly refuse to accept the test data.	Add a Section to the Bxx draft that discusses all of the different aspects of the Declaration, including that the rights will be included in the Declaration(s?), and whether there is any ‘umbrella’ aspect of the Declaration (such as exists with the DoMCs in the MAA).	1	Agree. Further detail will be included in B xx.
DE	3.3/5.5	Gen	Corresponding members can use the OIML certificates anyway. It cannot be seen that the recognition as “Associates” will in any case stimulate Corresponding members to become part of the OIML family.	Delete 3.3, 5.1.2 and 5.5 “Associates”. Open the possibility to have “a look inside” the system by getting the chance to ask for a timely limited “guest status” in the MC of the representatives of Corresponding members.		OIML CSPG voted to include the concept of Associates in B xx. This aligns with the existing MAA system.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
JP	3.3	Edit	In 3.19, the expression “OIML Certificate” is used. It may be better to use the same expression for consistency.	It seems better to insert “OIML” before “Certificate” as shown below.  Present: OIML type evaluation/test reports or Certificate  Suggested: OIML type evaluation/test reports or OIML Certificate		Agree. Document will be reviewed to ensure consistent use of OIML Certificate.
DE	3.6	gen	The content under the note is not only an additional information but substantial.	Delete “note” and let the content of the note be regular part of chapter 3.6.		Agree - wording will be modified.
US	3.6	Tech	It is improper for the BIML to serve as Chair of the AP and TLF.	The AP and TLF should select a Chair from amongst its members. BIML staff shall be the secretary of the AP and TLF.		Agree. B xx will be modified accordingly.
DE	3.14	Gen	The topic of “additional national requirements specified in the Declaration” is problematic. An OIML certification of additional nationally relevant aspects will not support the development of OIML recommendations and/or national requirements into the direction of worldwide standardisation (unification). It is supposed that in contrast to that OIML objective it will slow down the development because there is no need to get active as long as a certification via OIML is possible.	See Proposal under 5.3	High	See response to DE 5.3.
JP	3.14	Edit	In this draft, an expression “type evaluation” in lower case is used except 3.14.	Correct “OIML Type evaluation report” to “OIML type evaluation report” using lower case.		Agree. Will change to lower case for consistency.
JP	3.14	Edit/tech.	“Issuing Participant” is not defined in this draft.	Replace “an Issuing Participant in the OIML-CS” with “an Issuing Authority participating in the OIML-CS”.		Agree. Will change to Issuing Authority.
PL	3.14	Edit.	A definition of ‘OIML Type evaluation report’ refers to an Issuing Participant, whereas in the framework of OIML-CS there are Issuing Authorities.	Replace ‘an Issuing Participant’ with ‘an Issuing Authority’.	low	Agree. Will change to Issuing Authority.
DE	3.17	Techn + gen	If the information about designation and acceptance of TLs is given for Scheme A it has to be given for Scheme B, too.	Delete “In Scheme A”.		Disagree. The primary focus is to move instruments from Scheme B to A, so it is not considered necessary to ‘approve’ TLs under Scheme B.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
JP	3.17	Gen/tech.	In the present OIML Basic Certificate System, designation of a test laboratory is required. If we understand the concept of OIML-CS correctly, a test laboratory in Scheme B should be also designated by an issuing authority and accepted by the MC.	Revise the second sentence by adding “and Scheme B” as shown below.  In Scheme A and Scheme B, the test laboratory is designated by an Issuing Authority and accepted by the MC.		Disagree. The primary focus is to move instruments from Scheme B to A, so it is not considered necessary to ‘approve’ TLs under Scheme B.
DE	3.20	Gen	The definition of the term “Certification body” is not clear.	Add the definition of “Certification body” in the chapter Terminology and abbreviations.		See response to NL 3.20 below.
NL	3.20	gen	The text is modified, however the Utilizer can also be a national (governing) authority, which does not need to be a Certification body	Change “Certification body” in “Any kind of organization”	Medium	Wording from B 10 will be used.
PL	3.20	Edit.	A definition of ‘Utilizer’ stipulates that it is ‘a certification body from an OIML Member State that has signed the Declaration, indicating the terms of acceptance of OIML type evaluation/test reports issued under Scheme A or Scheme B.’ In the previous version of the definition ‘OIML Certificates’ were also mentioned, and so the definition was as follows: ‘Utilizer: Certification body from an OIML Member State that has signed the Declaration, indicating the terms of acceptance of OIML type evaluation/test reports or OIML Certificates issued under Scheme A or Scheme B by Issuing Authorities.’ Why was it changed?		low	Under the certification system acceptance is based on type evaluation (and test) reports rather than certificates.
DE	4.1+4.3	Techn.	Who is going to manage the list of CS categories and the respective schemes approved by the CIML and where can it be found?	Change the note under 4.6 into a new point 4.7 and add “in 4.1, 4.3 and 4.6,” behind “...instruments concerned”.		Agree to improve the wording and to change the note in 4.6 to a new 4.7.
PL	4.1	Edit.	‘OIML-CS Management Committee (MC)’ has already been explained in section 3 Terminology and abbreviations, so there is no need to repeat the explanation of the abbreviation.		low	Agree.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
US	4.1	Tech	The OIML-CS should be applicable to all categories of measuring instruments for which there exists an OIML Issuing Authority, and an OIML Recommendation exists and the Recommendation specifies the a) metrological and technical requirements, b) test procedures, and c) OIML Type Evaluation Report Format.  It shouldn't be necessary for the MC to be the gatekeeper to participation in the scheme. The Recommendation is already approved by the CIML.	Integrate 4.1 and 4.5	2	Agree.
NL	4.2	gen	The use or wording scheme A and B is for internal documentation, Basic and MAA will be displayed in Test reports and Certificates. Exchange wording between the brackets	OIML MAA (Scheme A) OIML Basic (Scheme B)	High	Disagree. Will retain the terms Scheme A and B as these have been approved by the CIML. However, the existing OIML and MAA logos will be retained for Scheme B and Scheme A respectively. Will delete references to MAA and Basic in brackets.
ES/CEM	4.3	Gen	In this point it is said that a category of instrument is either in Scheme A or B but maybe it should be possible to be in both, specially in transitional period.	that a category of instrument is either in Scheme A or B but maybe it should be possible to be in both, specially in transitional period.		Disagree. This conflicts with the CIML approval that a category of measuring instrument is either in Scheme B or Scheme A.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
JP	4.3 and 16	Gen	<p>In the transition period from the present certificate systems (Basic &amp; MAA) to OIML-CS, how are the participants (issuing authorities, utilizers and associates) selected? According to the proposed roadmap (BIML_P1_N015-Updated Roadmap OIML.pdf), it seems that a provisional MC will decide the scheme and the participants for each category of instrument. However, a comprehensive explanation about procedures in the transition period is not found in Bxx.</p> <p>The statement in 4.3 specifies that either Scheme A or Scheme B shall exist for one category. If this policy is applied strictly, each of the present three categories (R 49, R 60 and R 76), which exist in parallel for the Basic and MAA systems, shall be merged into single scheme (preferred to be 'A'). Such a semi-compulsory merger will however give rise to significant confusions to the issuing authorities under the OIML Basic Certificate System in these categories.</p>	<p>A comprehensive explanation about the transition period to OIML-CS should be added in Clause 16.</p> <p>A grace period (at least 2 years) should be allowed in the merging process of the two parallel schemes for R 49, R 60 and R 76. An appropriate statement on the grace period should be added in Clause 16.</p>		<p>The proposal is for R49, R60 and R76 to be in Scheme A on the 1/1/18. Existing Issuing Participants under the MAA will automatically become Issuing Authorities for these Recommendations, on the provision that they supply an MAA annual report in 2017 and they sign the new Declaration under the OIML-CS.</p> <p>It is proposed that further categories, for example R46, R51, R117 and R137, will be included in Scheme A from the 1/1/19 on the provision that suitable experts have been identified to perform the assessments and to participate in the AP.</p> <p>Other instrument categories where the OIML Recommendation contains the necessary parts will enter into Scheme A on the 1/1/20.</p> <p>New recommendations that are subsequently approved by the CIML will enter into Scheme B. After two years, they will automatically transfer to Scheme A unless there are exceptional circumstances identified by the MC.</p> <p>Revisions of existing Recommendations that are already in Scheme A will continue in Scheme A. Existing IAs will need to demonstrate to the MC that they are competent to issue certificates under the requirements of the new revision.</p>

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
NL	4.4	gen	To obtain optimal acceptance and participation of member states, there is the need for a clear procedure on how to transform from scheme B to A. Changing from scheme B to A may be possible for IAs' (labs), while other IA (labs) need time to obtain accreditation or perform peer assessment. This may require more time than foreseen (e.g. investment in equipment). These IAs must have the opportunity to continue the work under the Basic scheme. A clear transition period, agreed by the participants, shall be elaborated upon resulting in the MC procedures. Withdrawing the Basic system may include the risk of withdraw of potential bodies who would like to participate in the OIML-CS, but are not ready for full assessment.	Elaborate on MC procedures to include a clear and acceptable transition from scheme B to A. Although the non-coexistence of B and A is discussed, reading the comments from several member states, the withdrawing of the scheme B is still unclear or misunderstood. This includes its status under the new system.	High	See response to JP 4.3 and 16.
JP	4.5 c)	Edit	Generally, "test report" in lower case is used in this draft.	Change the present expression to: c) the format of the OIML test report		Agree. Will change to ensure consistency.
DE	5.1.2	ed	a) Note 1 under chapter 5.1.2 does not correspond to the content of the chapter. b) Note 2 shall become a separate par.5.1.3	a) Move Note 1 "An OIML Issuing ..." to chapter 5.1.1. b) Note 2 shall become a separate par.5.1.3		Agree.
JP	5.2	Edit	Two similar expressions "peer evaluation" and "peer assessment" are used in the same text. However, the difference between them is not clear.	Change the description as shown below.  Present: ... demonstrated by peer evaluation, on the basis of accreditation or peer assessment.  Suggested: ... demonstrated by technical peer assessment accompanied with laboratory-accreditation or quality-system peer assessment		Do not agree. Current wording will be retained.
UK	5.2	Techn	Compliance should be demonstrated through ISO/IEC 17025 for testing laboratories so this should be specified rather than making reference to Section 7 which does not provide the necessary information. Consideration could also be given to assessment of compliance with ISO/IEC 17065 for the Issuing Authority.	Modify the first sentence to read: "... participation in Scheme A or Scheme B are the same, with the testing laboratories requiring compliance to ISO/IEC 17025." Consider also including reference to ISO/IEC 17065.	Medium	Agree to include wording relating to 17025 for TLs. Also include a requirement for IAs to demonstrate competency; for Scheme A this can be through the application of accepted international standards, e.g. 17065, and for Scheme B this can be through self-declaration.



Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
DE	5.3		See comment under 3.14	Add some wording that within a specified time frame national legislation will be fully aligned with OIML Recommendations.		Countries have a moral obligation only to align their national requirements with OIML Recommendations. Permitting additional national requirements will enable countries to 'sign-up' to the new system who may otherwise not wish to take part if their national requirements cannot be addressed.
JP	5.3 (and 3.8)	Gen	Regarding signature (registration) to the Declaration, differences between Schemes A and B are ambiguous as pointed out by the three questions below.  1. We understood that a signature would be required for all of the issuing authorities, associates and utilizers in both Schemes A and B. Is it correct?  2. We understood that an issuing authority in Scheme A (MAA equivalent) should accept a certificate issued by another issuing authority. Is this policy the same also in Scheme B? We presently understand that acceptance is required also in Scheme B from the statement in Note in 3.8.  3. We understood that additional national requirements are applicable both Schemes A and B. Is it correct?	If there are differences between Scheme A and B in regard to signature, acceptance of certificate and additional national requirement, they should be clarified.  We request that acceptance of the certificates in Scheme B should be voluntary. If it is not voluntary, additional national requirements shall be also accepted in Scheme B.		Agree. Wording will be modified regarding acceptance under Scheme B.
US	5.3 and 5.4	Tech	Neither of these clauses convey the important aspect that an Issuing Authority or a Utilizer still has the right under the Declaration/OIML-CS to not accept test data that is questionable, and is entitled to seek clarification and possibly refuse to accept the test data. (The earlier Observation of the Convener is incorrect. See B 3, Sections 1.1 and 3.11; B 10, Sections 1.3, 1.5, 3.4 and 13.4 for discussion of the voluntary aspect of accepting test results in the current Basic and MAA certificate systems.)	Add "(voluntary)" before "acceptance" in both clauses, or provide a footnote explaining this aspect for both clauses.	1	Agree. Will review and update wording to reflect the "voluntary" nature of acceptance.
NL	5.4	gen	Comments were given to include a clause not to accept test data (under circumstances). This was disagreed as there is no similar reference in the current B3 and B10.	This clause is given under 13.3 of B10: In case the test data are not accepted, written justification for denial shall be sent to the relevant Issuing Participant and the manufacturer.	High	Agree. Will amend wording accordingly.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
DE	6 b	Techn.	Will those documents be identifiable by an index like the former MAA-documents, e.g. CS-yyy ?	Proposed change: The documents have to be clearly identified as Operational Documents (CSOD) or Procedural Documents (CSPD).	low	Wording will be updated to reflect the nature of the documents and any proposed numbering system.
ES/CEM	6,b) 9 11.4	Gen	The rules of procedure governing the OIML -CS non included y the basic publication will be developed, maintained and approved by the MC. We believe that there are many important issues not detailed in the basic publication that are important and therefore the CIML should approve the procedures proposed by the MC.	Include in 6.b that CIML must approve the procedures proposed by MC, include this responsibility in point 9.  Modify 11.4k) in order to establish that MC develops, maintains and proposes to CIML for approval rules and procedures for the operation of the schemes in.....		Disagree. It is essential that MC has the autonomy to make decisions regarding the operation of the OIML-CS and the associated documentation to ensure operational effectiveness of the MC. CIML will have oversight of the OIML-CS and MC decisions through the annual reports to the CIML.
SE	6	gen	We are aware of the fact that this is a framework document. Nevertheless, it is not possible to foresee the operation of the certification system as, according to 11.4 k) and l), the development, maintenance, approval of rules and procedures is delegated to the Management Committee (MC). In the light of this, we find it difficult to vote on a system which is not defined as the operation will be decided later on and on a lower level (MC) without the approval of CIML.			Disagree. It is essential that MC has the autonomy to make decisions regarding the operation of the OIML-CS and the associated documentation to ensure operational effectiveness of the MC. CIML will have oversight of the OIML-CS and MC decisions through the annual reports to the CIML.
UK	6	Gen	The list of governing documents should be expanded to include reference to 'Operational documents', 'Procedural documents' and 'Forms/Templates'. Information should also be provided on the precedence of the various documents should be given.	Reword section 6 as follows:  "The governing documents for the OIML-CS are a) OIML B xx Framework for the OIML Certificate System (this publication), approved by the CIML, b) Operational documents developed, maintained and approved by the MC, c) Procedural documents developed, maintained and approved by the MC, and d) Forms and templates developed, maintained and approved by the MC."  Use the relevant text from the final paragraph of Section 4 of IECEx 01.	Medium	Agree, and will include a reference to the proposed numbering system for ODs and PDs.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
DE	7	Gen	Of course OIML-CS will base on diverse standards. Just now the real content of the chapter is only, that the MC will decide about the applicable ones. In any case information is needed where the respective list of defined standards may be found.	Add the piece of information that a complete list of the documents and standards that have been defined by the MC and accepted by the CIML will be published and updated on a regular basis by the BIML on the corresponding website.	high	This section will be reworded to detail the fact that the standards are the OIML Recommendations which are used in the system. Other standards, such as 17025, will be detailed at the appropriate points in the text.
UK	7	Techn	In light of the comment above regarding Section 5.2, Section 7 should be deleted as the applicable 'standards' should in fact just be the OIML Recommendations which are used in the system and which are already referenced elsewhere in the document, e.g. Section 4.5.	Delete Section 7 and renumber subsequent sections.	Medium	See response to DE 7 above.
AU	9		With regards to the issue of governance of the OIML CS, there are several matters that require consideration and resolution. The rules and requirements of membership and voting of the MC, AP, TLF and BoA are of vital importance to the acceptance and success of the OIML CS. For example, what percentage of member votes is required in the MC in order to provide a recommendation to the CIML regarding a category of instrument being included in Scheme A? Is 51% sufficient? Is it appropriate that the MC be required to decide upon its own voting rules? How would that vote take place? It is suggested that CIML should approve the rules and requirements relating to membership and voting of each of the MC, AP, TLF and BoA. It is recognised that the membership rules of the MC have been described in this document (which we agree with), which will require approval by CIML. However, the voting rules in the MC are just as important and CIML should approve these as well. In addition, the membership and voting rules for the AP, TLF and BoA require more details. Rather than making significant amendments to this document, the proposed change (see adjacent) would allow the rules and requirements to be developed and revised under the MC operational documents, however the elements that relate to membership and voting would require approval by CIML.	Suggest the following point is included in clause 9 d): iii. requirements and procedures concerning the membership and voting of the MC, AP, TLF and BoA.		Disagree. It is essential that MC has the autonomy to make decisions regarding the operation of the OIML-CS and the associated documentation to ensure operational effectiveness of the MC. CIML will have oversight of the OIML-CS and MC decisions through the annual reports to the CIML.
DE	9+10	Ed	It is not the aim of this document to describe the CIML or BIML.	Change the titles of both chapters into "Tasks of CIML/BIML within the OIML-CS".	Medium	Agree. Wording will be changed.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
JP	9	Gen	A limitation to the term of MC Chair is needed.	We propose six-year term as a maximum.		Agree. This will be detailed in the Operational documents.
JP	10.2 and 11.1 d)	Gen	It is understood that the same person of BIML would be responsible of Executive Secretary of MC, Chair of AP and Chair of TLF. However, such a triplicate assignment is not appropriate from a viewpoint of neutrality of the person as well as independence of the three committees (MC, AP and TLF).	The three important positions should be taken by different persons independently.		Agree. Text will be modified accordingly.
ES/CEM	11 b)	Gen	MS should be able to nominate some representative for the MC who is not a member of an Issuing Authority or Utilizer	Delete the last part of the letter b).		Agree. Text will be modified accordingly.
DE	11.2	Gen	The chapter contains important information, but, more or less only the distribution of the votes, not the voting rules. Taking into account comment no 59 of Australia on the last draft it seems to be a good idea to have a clear guidance about the voting rules in all parts of the OIML-CS. Good template can be found in the draft of OIML B6.	Include a “big chapter” or at least a small one under “16 Operation of the OIML-CS” concerning the voting rules in the OIML-CS. At a first glance there is no need to have different voting rules for the different parts except probably for the BoA.	High	Agree. Voting rules for the MC will be defined in B xx.
PL	11.3	Edit.	Unclear sentence: ‘Representatives of other Issuing Authorities, Utilizers or Associates of that country (if any) may also attend as observers.’		low	Wording will be reviewed in response to ES/CEM comment 11 b) above.
PL	11.4 h	Tech.	According to the section 11.4 point h the MC shall make decisions on membership of the Advisory Panel, whereas according to the section 12.1 the AP consists of experts nominated by CIML Members and appointed by the MC for certain categories of measuring instruments, which essentially means that the composition of the AP is not an independent decision of the MC.		low	Disagree. The MC will decide if the experts nominated by CIML members are suitable to be members of the AP.
US	11.4 k&l	Tech	The CIML should have final authority over some of these approval decisions, such as rules and procedures.	Add a “iii” to Section 9 c elaborating on how the CIML can take action on the activities of the MC detailed in Sections 11.4 k) and l).	2	Disagree. It is essential that MC has the autonomy to make decisions regarding the operation of the OIML-CS and the associated documentation to ensure operational effectiveness of the MC. CIML will have oversight of the OIML-CS and MC decisions through the annual reports to the CIML.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
JP	12.2 a) (and 5.2)	Tech/e dit	In accreditation systems, an accreditation report is not an essential document to prove compliance to the applicable standard. Instead, an accreditation certificate demonstrates the compliance. For your information, Clause 5.2 permits another method to demonstrate the compliance without accreditation. (See our comment to 5.2.)	In compliance with our proposal of amendment in 5.2, change the expression in 12.2 a) as shown below.  Present: ... including accreditation and peer assessment reports  Proposed: ... including technical peer assessment report and accreditation certificate/quality system assessment report.		Agree that the accreditation certificate is an important piece of evidence that should be provided, along with the scope of accreditation. Wording will be reviewed accordingly.
CH	14		The construction of clause 14 differs considerably from clauses 11,12, and 13. While the previous clauses describe mainly the composition and the main tasks of the bodies, clause 14 contains in its present form procedural instructions (“Decisions by the MC may be appealed to the BoA...”) In addition, not all decisions by the MC can be appealed (i.e. the previously cited sentence is not accurate). Presumably the idea was to open a way of appeal for decisions concerning Issuing Authorities (or experts on the list)	a) Introduce a new clause “Application” between 5.2 and 5.3 where the procedure for an application as Issuing Authority is described: A party willing to participate in the OIML-CS as Issuing Authority registers an application with the MC according to the rules set by the MC. The MC decides on the acceptance (this can be completed with ‘within xxx days’). Decisions by the MC may be appealed to the BoA (first instance) and then to the CIML (second instance). b) Simplify clause 14 14.1 The BoA consists of three CIML members, appointed by the CIML (cf remark below) 14.2 The tasks of the BoA are to manage appeals against decisions of the MC - on participation in the OIML-CS - on the membership of the Advisory Panel - on the list of OIML Technical and Quality Management System experts.		It is proposed that the BoA will be a standing committee, with a Chairperson and four members appointed by the CIML. The wording of section 14 will be modified accordingly.
PL	14	Gen.	BoA is an internal appeals committee of first instance. CIML in this case is an institution of second instance. Isn’t it a procedural problem that the same people that make decisions in first instance, as the BoA consists of CIML Members, also make decisions (or at least contribute to making decisions) in second instance?	The CIML Members involved in making decisions as BoA members should probably be excluded from the decision making process at the next stage (second instance).	medium	See response to CH 14.
UK	14.1	Gen	It is not possible to appeal to the BoA as the BoA is not a standing committee.	Modify the sentence as follows: “Decisions by the MC may be appealed to the Executive Secretary who informs the CIML President.”	Medium	See response to CH 14.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
UK	14.2	Edit	The first part of section 14.1 and the first sentence of 14.2 is duplication.	Delete the first sentence of section 14.2.	Medium	See response to CH 14 above.
CH	14.3		At present, the members of the BoA are selected by the CIML-president. We would favour a solution where the members are appointed by the CIML.	(cf remark on section 14, here above)		See response to CH 14 above.
UK	14.3	Edit	This section should immediately follow the section dealing with the appeal being raised.	Swap the existing sections 14.2 and 14.3 so that the establishment of the BoA then follows the raising of the appeal.	Medium	See response to CH 14 above.
DE	14.4	Ed	It seems to put one on the wrong track if something important for the OIML-CS is included in “MC operational documents”. Even if the MC proposes and decides about those operational documents they are “CS operational documents.	Be careful with the term “MC operational documents” and substitute it, if possible, by the term “CS operational documents”	medium	Agree.
SE	14.4	gen	It is not clear to us what tasks and authority will be given to the BoA and on what legal ground as the procedures relating to the operation of the BoA will be developed and decided by the MC.			Detail on the operational procedures will be provided in the Operational and Procedural documents. It is common practice for Certification Bodies to define their own appeal mechanisms.
DE	15	Techn	To prefer primarily correspondence as working tool is totally acceptable. Anyway it will be necessary to define something more about meetings – organisation, costs, attendance etc.	Add a sentence like “Detailed arrangements will be defined in the respective CS Procedural Documents.	Medium	Agree.
NL	15	gen	Agree with the comment of ES/CEM on making information public. This shall be clearly elaborated and followed.	Elaborate in MC procedure	High	Agree.
JP	16.3	Gen/tech.	Note 2 requires an issuing authority undergo an assessment when a revised Recommendation is published. However, it should be noted that some issuing authorities continue to using an earlier version. In addition, this note should be moved to the main text of 16.3 considering its importance.	Revise Note 2 as shown below and move the entire text to the main text after the first sentence.  A revised version may contain substantially different requirements. Therefore, existing Issuing Authorities shall undergo assessment under the scope of the revised version if they determine to issue certificates based on this version.		Agree to amend wording to move ‘Note 2’ into main text.
JP	16.4 (and 4.4)	Gen.	It seems that this statement contradicts the important policy in 4.4 “the aim is for all categories of measuring instruments in the OIML-CS to be in Scheme A.”	This is just a comment. No amendments are requested.		Noted.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
NL	16.5	tech	The text is modified, however in the text still it is mentioned that the only valid version is the electronic version on the OIML website. From legal point of view it is the document issued by the IA to the applicant. OIML has no legal responsibility or liability to the issues documents.	The only valid version of an OIML certificate is the paper or electronic version issued by the Issuing Authority to the applicant. The validity of the certificate can be verified with the certificate registered at the OIML certificate.		Agree. Wording to be amended accordingly.
DE	16.6	Gen	It seems to be necessary to point out more clearly what the consequences are, especially for the future of “Basic Certificates”.	Probably add a new point 16.7 dealing with “old” Basic Certificates.	High	Agree. A new section will be created regarding Basic certificates.
JP	16.6	Edit	“Participant” is not defined in this publication.	Replace “Participants in the OIML-CS” with “Utilizers in the OIML-CS” or “Utilizers and Associates in the OIML-CS”.		Agree. The wording will be modified.
JP	16.6	Gen/tech.	In the present statement, validity of the OIML Basic Certificates, which have been issued in the past, is not specified explicitly. We request that issued OIML Basic Certificates would be effective for the time being even after OIML-CS is operated. Immediate expiration of the Basic Certificates would give rise to significant inconveniences and confusions to the manufacturers.	A statement which assures validity of all issued OIML Basic Certificates for a certain period should be added in 16.6 or 16.7.		See response to DE 16.6 above.
US	17.2	tech	How will separately budgeting and accounting for income and expenses for the OIML-CS ensure that the operation of the OIML-CS will not lead to an increase in the OIML membership fees? Separately budgeting and accounting should help track and hence facilitate not increasing fees, but it certainly won’t ensure it! (The possibility of eventually hiring another BIML staff member for the OIML-CS has not been discounted in writing by the BIML Director.) Also, it should be clarified whether fees collected from Certificates can be used for other purposes at the BIML other than for OIML-CS activities. (It seems that it is not known whether this is being done now under the MAA.)	In 17.2, replace “ensure” with “help facilitate”.  Also, clarify Section 17 about these other things.  (If the MAA truly suffers from all of the claimed deficiencies detailed in BIML_P1_SG1_N008 (the Annex to the covering letter), then why does the MAA continue to be used and bring in considerable revenue to OIML?)	1	Agree to replace “ensure” with “help facilitate”.  Other points noted.

Country Code/ Organization	Section	gen./ edit./ techn.	COMMENT	Proposed change	Priority	OBSERVATIONS OF THE CONVENER
DE	18	Ed/ techn	Many of the Definitions in chapter 3 are of the VIML, thus, it should be referred to. It is strongly recommended to make use of the voting rules described in OIML B 6. If so even this document has to be listed too.	Add at least VIML (OIML V1:2013).	High	Agree to include a reference to the VIML.