

FINAL DRAFT  
AMENDMENT

**Draft 3**

49th CIML Meeting

Auckland 2014

INFORMATION

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**Amendment to R 35-1**

Material measures of length for general use.

Part 1: Metrological and technical requirements

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ORGANISATION INTERNATIONALE  
DE MÉTROLOGIE LÉGALE

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INTERNATIONAL ORGANIZATION  
OF LEGAL METROLOGY

## **BIML Notes**

- 1 No “marked” version of this FDR is supplied, since there were no changes to the FD submitted to CIML preliminary ballot.
- 2 Please note that this file was uploaded to the 49th CIML Meeting web site on **14 August 2014**

**Amendment to R 35-1 *Material measures of length for general use***  
***Part 1: Metrological and technical requirements***

**CIML Preliminary online ballot**

**Deadline: 2014-08-07**

**Votes cast: Yes: 28 / No: 5 / Abstain: 0 / Did not vote: 27**

**Result: Passed**

AUSTRALIA	Voted Yes on 2014-05-30
AUSTRIA	Voted Yes on 2014-07-03
BELGIUM	Voted Yes on 2014-08-01
BRAZIL	Voted Yes on 2014-08-01
CAMEROON	Voted Yes on 2014-07-23
CANADA	Voted Yes on 2014-06-26
COLOMBIA	Voted Yes on 2014-07-03
CUBA	Voted Yes on 2014-08-05
DENMARK	Voted No on 2014-05-08
FINLAND	Voted Yes on 2014-07-08
FRANCE	Voted No on 2014-08-07
GERMANY	Voted No on 2014-07-25
HUNGARY	Voted Yes on 2014-08-06
INDIA	Voted Yes on 2014-08-07
IRELAND	Voted Yes on 2014-07-02
JAPAN	Voted Yes on 2014-06-30
KAZAKHSTAN	Voted Yes on 2014-08-07
KENYA	Voted Yes on 2014-07-03
KOREA (R.)	Voted Yes on 2014-08-05
MONACO	Voted Yes on 2014-05-08
NETHERLANDS	Voted Yes on 2014-07-01
POLAND	Voted Yes on 2014-07-04
ROMANIA	Voted Yes on 2014-08-07
RUSSIAN FEDERATION	Voted Yes on 2014-08-01
SERBIA	Voted Yes on 2014-05-09
SLOVAKIA	Voted Yes on 2014-08-06
SLOVENIA	Voted No on 2014-08-01
SWEDEN	Voted No on 2014-08-07
SWITZERLAND	Voted Yes on 2014-06-13
TANZANIA	Voted Yes on 2014-07-22
UNITED KINGDOM	Voted Yes on 2014-06-11
UNITED STATES	Voted Yes on 2014-07-23
VIET NAM	Voted Yes on 2014-07-22



OIML TC 7

Secretariat: UK

## Comments on Draft Amendment to OIML R 35-1

Due Date: 7 August 2014

### GENERAL COMMENTS

Member	Clause	Comment	Secretarial comment
AU	General	The recommendation as currently drafted does not provide sufficient detail about what is an acceptable way for the material measure to carry temperature correction information, without it being marked on the measure. As such, this can be interpreted to include a document being supplied with the measure. Therefore it would be beneficial either if the recommendation was to provide some detail on what alternatives are acceptable or definitely require the marking of thermal expansion coefficient.	The information to be marked on the material measure including the temperature is specified in R35-1 2007 E clause 10 and R35-2 sub-clause 6.2.2. If future application of R35-1 determines that there is a need for additional clarification regarding the marking of the temperature coefficient, then this will be looked at in amendments or revisions.
DK	General	<p>The proposal will require skilled personal to obtain correct measurements. That is outside the scope of legal metrology as we see it.</p> <p>Furthermore it is in contradiction to the European Directive on Measuring Instruments (MID)</p>	<p>Temperature calculations are currently part of the accuracy determinations in R35-1 2007 E clauses 4.4.1 and 6, and R35-2, 6.2.2. As such test engineers will not find it difficult to get used to the new measurement process.</p> <p>This International Recommendation should serve as a useful guide and source of information for regional legal metrology regulations and directives. If R35 is approved it is expected that a proposal will be made to amend the MID.</p>

Member	Clause	Comment	Secretarial comment
FRANCE		<p>We maintain our no vote if the measures are for legal metrology</p> <p>For legal metrology purposes we believe the idea to have the expansion coefficient marked on the tape is not an appropriate solution.</p> <p>We maintain that the recommendation should be maintained in line with MID.</p> <p>The proposed evolution doesn't solve the problem identified which could be solved by an appropriate testing procedure.</p> <p>The length expansion requirement due to temperature requires a separate test, different from the accuracy requirements. Length expansion requirements are linked to an error variation, it should not be implemented with the accuracy test. There is a need to clarify the testing procedure.</p>	<p>Temperature calculations are part of the accuracy determinations in R35-1 2007 E sub-clauses 4.4.1 and 6, and R35-2, 6.2.2. As such test engineers will not find it difficult to get used to the new measurement process.</p> <p>Information to be marked on the material measure including the temperature is specified in R35-1 2007 E clause 10 and R35-2 sub-clause 6.2.2. If future application of R35-1 determines that there is a need for additional clarification regarding the marking of the temperature coefficient, then this will be looked at in amendments or revisions.</p> <p>If R35 is approved at the 49<sup>th</sup> CIML it is expected that a proposal will be made to amend the MID.</p> <p>Comments from Japan appear to support the proposed testing procedure.</p>
India	General	<p>Subject to condition that National Legislation may accept Recommendation partially or fully or may modified as per requirement of the country.</p>	<p>According to the OIML website International Recommendations are intended as model regulations for a number of categories of measuring instruments, and which OIML Member States are morally obliged to implement as far as possible.</p>

Member	Clause	Comment	Secretarial comment
Germany		Our vote NO corresponds to our vote casted on 2013-12-10 on the proposed amendment to R 35-1. In order to comply with the <i>Measuring Instruments Directive</i> we were in favour of proposal 2, that is to leave the requirements unchanged from the 2007 edition.	If R35 is approved at the 49 <sup>th</sup> CIML it is expected that a proposal will be made to amend the MID.
Slovenia		Measuring instruments for length are usually simple and used by untrained people, at least for class II and III. For Slovenia proposal 1 may be acceptable for class I, where it is more probably that the instruments are used by trained personnel. Proposal 1 is also in contradiction to MID.	<p>Temperature calculations are an existing requirement in R35-1 2007 E sub-clauses 4.4.1 and 6.2. As such test engineers will be familiar with the testing process.</p> <p>This International Recommendation should serve as a useful guide and source of information for regional legal metrology regulations and directives. If R35 is approved at the 49<sup>th</sup> CIML it is expected that a proposal will be made to amend the MID.</p>

Member	Clause	Comment	Secretarial comment
Sweden	General	<p>We agree with the comments from Slovenia that the instruments in question are in most cases used by less metrologically trained persons. With advanced markings and instructions there is a risk of unintended operational errors.</p> <p>To our understanding the proposed amendment is in contradiction with requirements in the measuring instrument directive (MID) (3.1, Chapter 1, Annex MI008).</p> <p><i>“3.1 Materials used for material measures shall be such that length variations due to temperature excursions up to <math>\pm 8</math> °C about the reference temperature do not exceed the MPE. This does not apply to Class S and Class D measures where the manufacturer intends that thermal expansion corrections shall be applied to observed readings where necessary.”</i></p> <p>The recommendation is not a “normative document” in the sense of the MID.</p> <p>Nevertheless, it is not seldom used by manufacturers and notified bodies in the manufacturing and conformity assessment processes. The reasons that are put forward, for the proposed amendment, are not in our view convincing.</p>	<p>Temperature calculations are an existing requirement in R35-1 2007 E sub-clauses 4.4.1 and 6.2. As such test engineers will be familiar with the new measurement process.</p> <p>This International Recommendation should serve as a useful guide and source of information for regional legal metrology regulations and directives. If R35 is approved at the 49<sup>th</sup> CIML it is expected that a proposal will be made to amend the MID.</p>