



**Agenda item 14.1.6**

**Final Draft new OIML Document *Guide for the application of ISO/IEC 17020 to the assessment of OIML Issuing Authorities under the OIML-CS***

**Information**



FINAL DRAFT  
DOCUMENT

57th CIML Meeting

2022

SUBMITTED  
FOR CIML  
APPROVAL

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New Document:

Guide for the application of ISO/IEC 17020 to the  
assessment of OIML Issuing Authorities under the  
OIML Certification System

(Information)

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ORGANISATION INTERNATIONALE  
DE MÉTROLOGIE LÉGALE

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INTERNATIONAL ORGANIZATION  
OF LEGAL METROLOGY



## Result of CIML online voting

### CIML Preliminary online ballot

#### **New Document: Guide for the application of ISO/IEC 17020 to the assessment of OIML Issuing Authorities under the OIML-CS**

Deadline: 2022-08-17

Status: Closed

Voted Yes: 36

Voted No: 1

Abstain: 1

Result: Passed

Country	Vote	Comments
AUSTRALIA	Yes	No
AUSTRIA	Yes	No
BULGARIA	Yes	No
CANADA	Yes	No
COLOMBIA	Yes	No
CYPRUS	Yes	No
CZECH REPUBLIC	Yes	No
DENMARK	Yes	No
FINLAND	Yes	No
FRANCE	Yes	No
GERMANY	Yes	No
HUNGARY	Yes	No
INDIA	Yes	No
IRAN	Abstain	No
IRELAND	Yes	No
ITALY	Yes	No
JAPAN	Yes	No
KENYA	Yes	No

Country	Vote	Comments
MONACO	Yes	No
NETHERLANDS	Yes	No
NEW ZEALAND	Yes	No
NORWAY	Yes	No
POLAND	Yes	No
PORTUGAL	Yes	No
ROMANIA	Yes	No
RUSSIAN FEDERATION	Yes	No
SAUDI ARABIA	Yes	No
SERBIA	Yes	No
SLOVAKIA	Yes	No
SLOVENIA	Yes	No
SOUTH AFRICA	Yes	No
SPAIN	Yes	No
SRI LANKA	Yes	No
SWEDEN	No	Yes
SWITZERLAND	Yes	No
UKRAINE	Yes	No
UNITED KINGDOM	Yes	No
ZAMBIA	Yes	No

Template for comments and convener's observations

Date:2022-08-22

Document: OIML-CS\_SC7\_P6\_N015

Project: OIML-CS/SC 7/P 6

Country Code <sup>1</sup>	Part	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Convener's responses
0001 SE				ge	<p>The certification system covers instruments within the scope of the European directives 2014/32/EU on measuring instruments (MID) and 2014/31/EU on non-automatic weighing instruments (NAWI). For these instruments there are guidance from Welmec and the European accreditation (EA) referring to preferred standards for the different conformity assessment modules in the directives. For issuing an EU-type approval (module B) the above guidance documents point to the standard ISO 17065. The current version of OIML-CS is well aligned with these documents. However, the proposed alternative path is not defined in the EA and Welmec guidance and it is unclear to us if such a certificate can be used on the European market without additional measures.</p> <p>Swedac accreditation comments: Offering two paths for acceptance inevitably raises the question of why? Are the two paths “equivalent”? If so, in what respect are they considered to be equivalent? Only a selected few would be able to themselves determine whether the two paths are in effect equivalent. Even fewer would be inclined to go through the exercise to ascertain it is. Yet, most people would by default assume the paths not to be equivalent, as they would not understand why two paths would be needed if that was the case.</p> <p>Why are they indeed needed? We understand that it is an issue of “pragmatism”. There are plenty of reasons for accreditation bodies to voice the argument for pragmatism. To perform the assessment to ISO/IEC 17065 may require an accreditation body to;</p> <ul style="list-style-type: none"> <li>• be a signatory to the IAF MLA agreement, and so having to be subjected to a peer evaluation performed by a peer evaluator trained in the application of ISO/IEC 17065</li> </ul>	Keep the one road solution: ISO 17065.	<p>Not agreed.</p> <p>The CIML approved the OIML-CS Management Committee proposal to allow OIML Issuing Authorities to use ISO/IEC 17020 (with additional requirements) as an alternative to ISO/IEC 17065 to demonstrate competence – see Resolution CIML/2021/31.</p> <p>The proposal approved by the CIML included a reference to Annex B of the European Accreditation (EA) document EA-2/17 M:2020 which allows the use of ISO/IEC 17020 (with additional requirements) as an alternative means of assessing competency for the purpose of type examination in the EU.</p>

1 Country code (enter the ISO 3166 two-letter country code, e.g. CN for China)

2 Type of comment: ge = general te = technical ed = editorial

## Template for comments and convener's observations

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					<ul style="list-style-type: none"> <li>• be a signatory to the IAF MLA agreement, and so having to abide to the set of applicable IAF MD documents</li> <li>• be a member of IAF, and so having to pay the membership fee, thereby contributing to the maintenance of the international MLA agreements related to certification</li> <li>• structure their fees so that the same work results in the same charged amount (many ABs charge per standard, so if a client need two accreditations there will be two fees, notwithstanding that assessments may cover the same set of requirements)</li> <li>• structure their assessor qualification rules in a rational way (many ABs qualify and witness their assessors per standard, not bothering to analyse to which extent assessments may cover the same set of requirements)</li> </ul> <p>We don't believe that the reasons above are sufficient to risk the transparency and credibility of the one road solution for pattern approval.</p>		<p>The ILAC Inspection Committee (responsible for accreditation issues associated with ISO/IEC 17020) has participated in the Working Group that has developed the new Document. SWEDAC had previously submitted these comments as part of the Inspection Committee review of the new Document, but the Chair of the Inspection Committee did not consider the comments to be representative of the views of the Inspection Committee.</p>

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