

Public consultation - Update for units of measurement directive

Subject: Directive 80/181/EEC Commission Staff Working Document On Units Of Measurement

I wish to comment on the document dated 22 December 2006 Directive 80/181/EEC.

Firstly I would like to point out an error on page 7 of the document, paragraph 4, last line:- the unit name 'Joule'. This must not have a capital letter as printed; the correct unit name should be 'joule' (symbol J).

Chapter 2 Question 1 Answer: Yes

Chapter 3 Question 2 Answer: No

Comment: Provide ALL the necessary information on the label. Multiple SI units on products can give a consumer useful information that he/she is entitled to know.

Chapter 4 Question 3

Comment: Ideally, arbitrary units (which are not part of the SI system) should not be encouraged. However use of some arbitrary units are OK, as long as there is no likelihood at all of confusion.

Concentration: should be expressed in SI units.

In the case of 'pH' the context must be absolutely clear : - acidity/alkalinity; 'pH' is also the symbol for 'picoHenry'.

Chapter 5 Question 4

Comment: First case: OK. Ratios using only SI units are acceptable.

Second case: NO. Avoid the use of all non-SI units.

Chapter 6 Question 5

Comment: Everything must be done to encourage the use of SI units and prohibit the use of non-SI units.

Chapter 7 Question 6

Comment: Everything must be done to prohibit the use of non-SI units.

'kcal', 'Kcal', 'Calories', 'calories', are extremely confusing; only kilojoules kJ must be used.

Use of 'kcal', 'Kcal', 'Calories', 'calories', must be discouraged IMMEDIATELY.

Similarly in other areas, like the examples given :- having two sets of measurements for example - inches and centimetres simply encourages confusion.

Chapter 8 Question 7 Answer: No

VERY IMPORTANT Comment: The deadline has already been postponed by ten years, and little progress has been made by the USA (at the federal level) in adapting to international standards. A further postponement will send a message that the EU will never actually enforce a deadline, and the Americans need not adapt.

If, and only if, the Commission is determined to propose a further extension of supplementary indications, it must apply only to labelling of packaged goods- it must NOT be extended to pricing of 'loose goods' - for example fruit and vegetables.

Chapter 9 Question 8

Comment: Everything must be done to ensure only SI units are used. Non-SI units should be archived and not used for any form of trade.

Chapter 10

Question 9

Comment: Note: the error on page 7. 'Joule' should be 'joule'.

Question 10

Comment: Benefits will be immense if only SI units are used. Costs- exceptions to the general rule of 'only SI units' will result in extra costs and continued confusion for many more years to come.

I request my comments and this contribution is taken into account by the Commission. Please acknowledge receipt of this email.

Thank you.

Philip Bladon