

Public consultation - Update for units of measurement directive

Subject : Consultation on the Units of Measurement Directive 80/181/EEC

I should like to submit my views as an EU citizen regarding the Units of Measurement consultation. I am willing for my comments to be published but only without reference to my name or address.

Please find attached a text file containing responses to the stakeholder questions in the consultative document, plus some additional comments.

UK - Anonyme

Attachment

22 January, 2007

1. Should the “katal” be introduced into Directive 80/181/EEC?

Yes. The katal should be introduced as a SI derived unit.

2. Should the use of SI-indications in specific uses be left to other directives than Directive 80/181/EEC?

Yes, providing that, in the absence of other directives on specific uses, that Directive 80/181/EEC should apply.

3. Should arbitrary units be included in Directive 80/181/EEC if supplementary indications are not allowed?

Yes, provided that arbitrary units are of those defined by an authoritative international body, such as the ISO.

4. Should ratios be included in Directive 80/181/EEC if supplementary indications are no longer allowed?

Yes, but only using compound SI units.

5. Should the exemption in Article 2b be maintained in Directive 80/181/EEC?

Whereas I would like to see SI units used in all fields, realistically the exemption should stand until such times as the fields of international air and sea transport adopt SI units.

There may be a case for removing the exemption for rail transport within EU countries if practicable.

6. Should indications specific to certain sectors be included in Directive 80/181/EEC?

Only existing products that need to meet specific tolerances should be permitted (pipe sizes in the consultation document example).

Industry enforced indications (such as inches for computer screens and televisions) which are not products that need to be manufactured to a specific size, should not be included.

7. Should the use of supplementary indications in Article 3 in Directive 80/181/EEC be able to continue?

No. The exemptions for the use of supplementary indications have already been extended by 20 years beyond their original 10 year exemption. I do not wish to see any further extension.

However, if supplementary indications are to continue then they should be permitted, where used, only on the following basis.

a) are factually correct

b) must state the exact unit used (e.g. US fl. oz.)

- c) can only be used for packaged goods (i.e. not for goods from bulk)
- d) can only be used on goods imported from a non-metric country, or are for export to a non-metric country
- e) the Directive must state which supplementary units are permitted. Currently any unit, however obscure, may be used

8. Do market operators face any problems with the current system?

No, the system works reasonably well within the EU and all other metric countries, but does need to be clarified as per other comments outlined in this submission.

The only existing problem is with trade between the United States and the EU. Although most US states permit metric-only labelling, more needs to be done at a US federal level. There is no evidence to suggest that the US federal government is intending to pass legislation allowing metric-only labelling in the near future.

Whilst the US is probably the EU's biggest trading partner I believe that the EU should take the lead in these matters and press ahead with ending these outdated concessions; this may be the impetus that the US needs. It does not seem reasonable that needs of just one country, however dominant, should dictate EU (or international) measurement policy.

Additional Comments

a. In addition to economic, public health, public safety or administrative purposes the Directive should be extended to include consumer protection. This would benefit all citizens, particularly in the areas of price and quantity comparison.

Using the example of television/computer screens already mentioned, the current practice (at least in the UK) is to state the screen size in inches; this is misleading as this refers to the diagonal dimensions of the physical screen, often including the supporting frame. The actual viewable area is typically less than the stated inch figure which, if stated, is given in centimetres.

Office and industrial space is often stated in square feet only.

The use of the 'acre' is prevalent in the UK.

Businesses often claim that these units are merely 'descriptive' and have no legal basis except when expressed as a unit quantity.

The Directive should be amended to eliminate these practices of obfuscation.

b. The four exemptions permitted in the UK for road traffic signs, etc should be ended by requiring the UK government to set a specific date as already stated in the Directive. If a reasonable date is not forthcoming the Directive should be amended to specify a date agreed upon by a majority of member states.

c. The Directive, as implemented by member states, must be on a more legal basis. The UK implementation, for instance, is very badly drafted and as such is purely advisory; there are no criminal or civil penalties that can be imposed for non-compliance and as such leaves the legislation unenforceable.

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