

Safeguarding the Voluntary System of Modular Evaluation in Legal Metrology

The voluntary modular evaluation enables certification of individual components in weighing instruments, supporting modern manufacturing practices and market flexibility. CECIP advocates for its continued use without expiration dates and encourages broader acceptance of modular certificates to facilitate global trade and innovation. This system operates within the framework of the European Directive 2014/31/EU on non-automatic weighing instruments (NAWID), which governs the conformity assessment procedures for placing such instruments on the EU market.

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The voluntary modular evaluation was developed in response to evolving practices in the production of weighing and measuring instruments. When Directive 2014/31/EU was introduced, it was assumed that manufacturers would produce all components of a weighing instrument themselves, with conformity assessed during the type examination process (Module B). However, as production methods changed, manufacturers - particularly those producing heavy instruments like weighbridges - began sourcing components from specialized suppliers rather than manufacturing them in-house.

To address this shift, the voluntary modular evaluation was introduced. It enables the certification of individual components and prevents repeated testing during the type evaluation of the complete measuring instrument. Modular certificates can be combined with type examination certificates, allowing the final instrument to be legally placed on the market.

The principles of this approach were developed by WELMEC around 2008 and are outlined in Guide 8.8 (2017), which covers the general and administrative aspects of modular evaluation within the framework of the NAWID and MID. The modular approach is also referenced in the harmonised standard EN 45501 (T.2.2). However, it is important to note that it has not been formally incorporated into European legislation.

The weighing industry has successfully used the voluntary modular evaluation for many years without major challenges. It is now a fundamental element of the market structure for the manufacture and supply of weighing instruments. Any undermining of this approach would likely have significant negative consequences for both manufacturers and the broader market.

Recently, two key issues have emerged in industry discussions:

1. The introduction of expiration dates on modular certificates – raising concerns about their necessity and potential impact.
2. The scope of general acceptance of modular certificates within type examination certificates – currently, general acceptance is largely limited to load cells.

These discussions are relevant to both the OIML Certification System and the certificates issued by notified bodies under the WELMEC framework for the European Single Market.

CECIP Position

CECIP firmly supports the continued use of the voluntary modular evaluation, which has proven to be effective and beneficial for industry. In CECIP's view:

- No major changes to the system are necessary.
- Introducing expiration dates on modular certificates would offer no tangible benefits and could introduce unnecessary complexity. CECIP therefore opposes this proposal. During the revision process of a type examination certificate conducted under the modular approach, all incorporated modular certificates must be thoroughly reviewed to verify their completeness and adherence to the prevailing legal requirements. This procedure guarantees that the modular certificates remain current and valid, irrespective of the presence of a validation date.
- The general acceptance of modular certificates should be encouraged and expanded beyond load cells. Broader acceptance would provide manufacturers with a more practical and globally applicable certification pathway, supporting innovation and international trade.