EXPLANATORY MEMORANDUM TO

THE MEASURING INSTRUMENTS (EXHAUST GAS ANALYSERS) REGULATIONS

2006 No. 2164

1. This explanatory memorandum has been prepared by the Department for Transport and is laid before Parliament by Command of Her Majesty.

2. Description

These Regulations implement Directive 2004/22/EC (the Measuring Instruments Directive) ("MID") and apply to exhaust gas analysers intended for use for the protection of the environment.

3. Matters of special interest to the Joint Committee on Statutory Instruments

None

4. Legislative Background

4.1 The Regulations are being made to implement the MID insofar as it relates to exhaust gas analysers. The Regulations are made under section 2(2) of the European Communities Act.

4.2 The MID was adopted in March 2004 and covers a number of different devices and systems, including gas and electricity meters; petrol pumps and automatic weighing instruments. It repeals ten other directives which covered these measurement systems and devices. Transitional provisions in the MID mean that current UK Regulations implementing those earlier directives may remain in force to regulate measuring instruments placed on the market after 30th October 2006 but produced pursuant to certificates of approval and EEC pattern approvals granted before that date, whilst those certificates and approvals are in force, provided that such instruments are duly stamped and passed as fit for use for trade as required by the relevant current Regulations.

4.3 No specific undertakings have been given to Parliament that relate to this instrument, in the course of debate, Parliamentary Question or Committee appearance.

4.4 The following is a list of the Regulations, including the one mentioned in this Memorandum, that to date have been prepared to implement the MID:

SI 2006/1720 The Measuring Instruments (Non-Prescribed Instruments) Regualtions 2006
SI 2006/1258 The Measuring Instruments (Automatic Gravimetric Filling Instruments) Regulations 2006
SI 2006/1259 The Measuring Instruments (Beltweighers) Regulations 2006
SI 2006/1264 The Measuring Instruments (Capacity Serving Measures) Regulations 2006
SI 2006/1257 The Measuring Instruments (Automatic Catchweighers) Regulations 2006
SI 2006/1268 The Measuring Instruments (Cold Water Meters) Regulations 2006
SI 2006/1255 The Measuring Instruments (Automatic Discontinuous Totalisers) Regulations 2006
SI 2006/2164 The Measuring Instruments (Exhaust Gas Analysers) Regulations 2006
SI 2006/1266 The Measuring Instruments (Liquid Fuel and Lubricants) Regulations 2006
SI 2006/1269 The Measuring Instruments (Liquid Fuel delivered from Road Tankers) Regulations 2006
SI 2006/1267 The Measuring Instruments (Measures of Length) Regulations 2006; and
SI 2006/1256 The Measuring Instruments (Automatic Rail-Weighbridges) Regulations 2006

Transposition

The SIs implement Directive 2004/22/EC on measuring instruments. The transposition note is attached.

Scrutiny Committee History

4.6 An explanatory memorandum (to Parliament) covering the opinion of the Commission on the European Parliament's amendments at second Reading (5788/04) to the common position of the Council regarding the proposal for a Directive of the European Parliament and Council Directive on Measuring Instruments was submitted by DTI on 17 February 2004. The Commons European Scrutiny Committee did not consider the text to be legally or politically important and cleared it from further scrutiny on 25 February 2004 (Report 11 Session 03/04). The Lords Select Committee on the EU in its Progress of Scrutiny sift of 24 February 2004 did not report on the content.

4.7 The amendments proposed by the European Parliament at second Reading did not change any of the provisions of the Directive in respect of matters which were of earlier concern to the Commons Scrutiny Committee and did not introduce any new technical provisions. The main focus of the amendments was to provide for greater transparency in relation to those areas in which the Member State may choose not to regulate, greater clarity in the presentation and drafting of the text, and an invitation to the Commission to

review more widely the arrangement of the Directive particularly in relation to conformity assessment.

4.8 The previous explanatory memorandum covering the amended proposal following the Commission's response to amendments of the European Parliament at first Reading (6121/02) was submitted by DTI on 12 March 2003. This was considered by the Commons European Scrutiny Committee to be legally or politically important and was not therefore, cleared from scrutiny and a request was made for further information (Report 32, Session 01/02). The Lords Select Committee on the EU in its Progress of Scrutiny sift of 01 April 2002 did not report on the content. Following this the key issues were resolved and a supplementary explanatory memorandum was presented for consideration. This was again regarded by the Commons European Scrutiny Committee to be legally or politically important and cleared (Report 4, Session 02/03). The Lords Select Committee on the EU in its Progress of Scrutiny sift of 09 December 2002 again did not report on the content.

5. Extent

This instrument applies to all of the United Kingdom.

6. European Convention on Human Rights

As the instrument is subject to negative resolution procedure and does not amend primary legislation, no statement is required.

7. Policy Background

Policy Objectives of the Directive

7.1 The primary aim of the MID is to create a single market in measuring instruments for the benefit of manufacturers and consumers across Europe. The MID specifies the essential requirements that a product covered by the Directive must meet before it can be placed on the market and put into use. These requirements are both general (the essential requirements that apply to all measuring instruments) and instrument specific. The MID requires manufacturers to follow a conformity assessment procedure to ensure that the product satisfies the requirements of the MID, but gives them a wide choice of assessment procedures from which to choose. These procedures may be specific to instrument types.

7.2 Under the optionality provisions of the MID, Member States can choose which measuring instruments to regulate and can also choose the measurement tasks to be regulated.

7.3 The MID has been implemented in the UK on the basis of 'status quo' i.e. maintaining the current scope of regulatory control, by only regulating those measuring instruments that are currently regulated and regulating the purpose of use, i.e. use for trade. By doing so, we aim to maintain the current levels of consumer protection, bring the benefits of the single market to business and avoid any further regulatory burdens on business. We have therefore introduced self-contained Regulations in respect of each type of measuring instrument concerned. Each set of Regulations includes the general requirements of the MID, the specific technical requirements applicable to the measuring instrument covered by the particular Regulations and the enforcement provisions.

The size and nature of the problem it is addressing

7.4 The MID will create a single market providing opportunities for UK manufacturers to innovate and to export their new products much more easily to the Member States, Norway, Icelend and Lichtenstein. The costs and time needed to get a product to market will reduce significantly. The single market will result in greater competition and improved choice for customers which, in turn, will help promote innovation. At the same time, barriers to trade will be removed and the market will become freer and fairer.

7.5 The MID is a 'New Approach' Directive, which means only the essential requirements are specified. Therefore, businesses have greater scope and choice about how to comply.

7.6 The optionality provisions of the MID will provide an opportunity for the UK to deregulate or regulate other measuring instruments if this is considered appropriate in the course of time. Deregulation would provide manufacturers with an even greater scope for innovation and would enable products to get to market more quickly and cheaply. However, measuring instruments are generally controlled in order to protect the customer from fraud or short measure – these measurements are important because they provide the basis for about £2bn of legal transactions on goods in the UK every week. The decision to maintain the status quo was supported in consultation.

7.7 There is generally no media attention and a low public interest in the policy.

7.8 The change is neither politically nor legally important.

Who has been consulted?

7.9 We have held two consultations: A Consultation on the approach to implementation in November 2004, followed by a Consultation on the draft Regulations implementing the Directive in August 2005. In addition, various stakeholder meetings were held during both consultation periods, along with visits and meetings with individual and regional groupings of Local Authorities, manufacturers and trade associations. The consultees were NWML Stakeholders including manufacturers, consumers, enforcement officers, trade associations, government organisations, consumer organisations

and individual businesses. For a full list of organisations consulted please see Annex B.

What was the outcome?

7.11 Outcome from 1st consultation:

Responses were very positive overall with a substantial majority of respondents supporting the proposed approach to implementation. Therefore, it was decided that the Government would:

- Implement on the basis of status quo, i.e. maintaining the current scope of regulatory control;
- Produce a self-contained Statutory Instrument for each type of instrument to be regulated;
- Issue a further consultation document to include the draft regulations themselves.

7.12 Outcome from 2nd consultation:

Varied comments were made in response to the list of instrument specific questions – although there were no specific comments on the Regulations relating to exhaust gas analysers. In addition, stakeholders raised a significant number of other issues and their own questions, provoked by the original consultation questions and the discussions at the stakeholder meetings. All comments have been considered, and changes made to the legislation where necessary to accommodate the concerns raised. Comprehensive notes for guidance on all of the Regulations will be produced and there will be a consultation on these in the summer of 2006.

7.13 Detailed analysis of the 2nd consultation responses (entitled 'Government response to consultation on the draft regulations implementing the MID November 2005') can be found on the NWML website, using the link below:-

http://www.nwml.gov.uk/Docs/MID/MID%202nd%20Consultation%20Government%20Response.pdf

8. Impact

A Regulatory Impact Assessment is attached to this memorandum.

9. Contact

Hayley Bowen at the Department for Transport, Tel: 020 7944 6575 or e-mail: Hayley.Bowen@dft.gsi.gov.uk can answer any queries regarding the instrument.

Final Regulatory Impact Assessment (RIA) on the Regulations implementing the Measuring Instruments Directive (MID)

This RIA pertains to the following Statutory Instrument:

The Measuring Instruments (Exhaust Gas Analyser) Regulations 2006

1. The Issue and Objective

1.1 Issue: The impact of the transposition of the Measuring Instruments Directive (MID) as it applies to exhaust gas analysers (EGAs) into UK legislation, on the basis of maintaining the status quo on regulatory control.

1.2 Objective: To implement the MID, which aims to harmonise essential requirements on exhaust gas analysers and other measuring instruments across the EU. The objective of the implementation is to open markets to competition; provide opportunities to innovate and export; improve choice for consumers; remove barriers to trade and reduce the regulatory burden for those instruments, through this deregulatory measure.

2. Risk Assessment

2.1 The intention is to maintain the status quo; that is to only implement the Directive to cover those instruments that are currently regulated in the UK, such as exhaust gas analysers. The new Regulations do not introduce further requirements, which could act as a burden on business. The risks of pursuing this course, and alternative courses of action, are covered under the three options set out below.

3. Identify Options

3.1 The three original options, and the risks associated with each, are set out below. These options were explored during the initial consultation. The consultation was in relation to the full scope of regulatory provisions, including exhaust gas analysers. In view of the responses to that consultation, we are proposing to proceed with option 2 below.

4. Results of Consultation

4.1 An initial consultation document on the general strategy for implementing the MID was issued by the National Weights and Measures Laboratory (NWML) in November 2004. The consultation document was made available on the NWML website and hard copies

of the document were circulated to over five hundred stakeholders, including the Garage Equipment Association (GEA) which represents exhaust gas analyser manufacturers. Forty one responses to the proposals were received, although none of the responses related specifically to exhaust gas analysers.

4.2 Responses were very positive overall, with a substantial majority of respondents supporting the proposed approach to implementation in principle.

4.3 95% of respondents who provided an answer to the question about status quo agreed that this would be the preferable way forward. 86% of those who replied to the question about deregulation did not want any instruments deregulated and 78% of respondents agreed with the proposal to produce a separate Statutory Instrument (SI) for each type of instrument to be regulated.

4.4 A second consultation document, on the draft regulations themselves was issued in August 2005. Twenty nine responses were received but again, no specific comments were received in relation to the exhaust gas analyser regulations.

4.5 NWML asked stakeholders to respond to a number of specific questions, relating to both general points and instrument-specific issues. In addition, stakeholders raised a significant number of other related issues and questions. All comments were considered and changes made to the legislation, where necessary.

4.6 <u>Option 1</u>
Do nothing.
a) face infraction proceedings against the UK for not implementing an agreed Directive;
b) miss out on the benefits of a harmonised set of requirements;
c) goes against the feedback received from the initial consultation document.

4.7 <u>Option 2</u>
Implement on the basis of status quo.
a) maintains current level of consumer protection;
b) does not introduce further burdens on business;
c) is in line with feedback from consultation document.

4.8 <u>Option 3</u>
De-regulate EGAs
a) risks unintended consequences such as loss of consumer protection;
b) goes against feedback from initial consultation document, which did not strongly support an increase or decrease in number of instruments regulated.

5. Issues of Equity and Fairness

5.1 Exhaust gas analysers with national certificates of conformity for type approval have a transition period under the Directive, which allows certificates to remain valid for a period of up to ten years after the date on which the MID Regulations come into force (30 October 2006).

5.2 The likely burden on small businesses is not considered to be proportionately any greater than for large businesses apart from the requirement to become familiar with the new legislation, which may be a factor where the small business has less administrative capacity.

6. Identify the Benefits

Option 1

6.1 The only benefit to UK manufacturers is that they would continue as at present. However, it is a disadvantage to the UK manufacturing base to remain regulated solely by UK legislation, as it is a disincentive to export to the EU marketplace, which will be closed to non-compliant exhaust gas analysers in any member state which has opted to implement the MID. UK manufacturing would then potentially be limited to the UK marketplace alone.

Option 2

6.2 The first benefit of implementation will be the removal of technical barriers that currently exist caused by dissimilar national regulation across the EU and the provision of a harmonised set of requirements for exhaust gas analysers. However, most Member States already comply with the Recommendations of the Organisation Internationale de Metrologie Legale (OIML), which means that, even under current national legislation, the technical requirements are the same.

6.3 The cost of testing and certification of exhaust gas analysers will also be reduced, as only one type or design approval will be required for the whole of the Community. The MID should therefore provide reductions in cost and time to market. Exporting should be easier and will become an option for companies that have not already explored that option.

6.4 Under the MID there are more choices for exhaust gas analyser manufacturers with respect to the routes to obtaining conformity assessment (previously known as type approval and verification). Options now include self-verification which enables the manufacturer to have more control over the conformity assessment of his products and the costs incurred.

6.5 Not only do exhaust gas analyser manufacturers have choice about how to obtain conformity assessment, they also have a choice about where to obtain that assessment. This will introduce an element of

competition into the marketplace and enable EGA manufacturers to shop around for high quality and value for money services. This will have the effect of removing the potential monopoly of the individual Member State, in relation to the home market.

6.6 A derogation period is provided for up to ten years before the Directive comes fully into force. It would, therefore, be possible for an EGA manufacturer to obtain a national approval up until 29th October 2006 to run for a maximum period of 10 years. This period exceeds normal product development times and is comparable with product life etc, so it is likely that, in practice, no significant non-recurring costs will be attributable to the Directive.

6.7 The Directive will have no impact on existing EGAs already placed on the market, which will remain controlled by the national legislation under which they were approved.

6.8 The MID does not, however, cover 'associated software', which in the case of EGAs relates to the VOSA data on pass/fail emissions levels which are input into the machine. EGAs which are to be used for MOT purposes, will not only have to conform to the MID but also have to be fitted with the relevant associated VOSA software.

Option 3

6.9 If we de-regulated EGAs, businesses only aiming at the UK market would have greater benefits through a reduction in the burdens resulting from compliance with regulations, but would not benefit from free access to the markets in all Member States. In addition, there would be a corresponding reduction in the level of consumer protection.

7. Quantifying and Valuing Benefits

7.1 Although we received no responses from exhaust gas analyser manufacturers of their representative trade associations, a number of responses were received from other instrument manufacturers and their trade bodies. The benefits/disadvantages of each of the identified option and the costs of gaining type approvals and complying with the MID for their instruments are likely to be similar to those faced by exhaust gas analyser manufacturers.

Option 1

7.2 No change – current national position prevails.

Option 2

7.3 In response to the initial consultation document, two companies and one trade association said that, post MID, the time to market should be reduced, in some cases significantly so. One company said that they expected time to market and costs to remain almost the same, although

they recognised that there would be some paperwork benefit. One trade association said that its members did not expect that there would be any significant increases in Type Approval costs in the Member State where the EU type approval was obtained. One company said that there might be future benefits from the wide range of conformity assessment modules available.

Option 3

7.4 If the number of measuring instruments regulated went down, then benefits to business could increase as, potentially, consumer protection decreased.

8. Costs

8.1 It normally takes one to two years to take a new product from initial concept to the marketplace. Development costs, including tooling, range from £150,000 up to about £2m depending on the complexity of the instrument. Approval times in the UK varies from about four weeks to between six to twelve weeks. Costs range from £3,500 to £15,000.

8.2 There are also costs attached to the exportation of products. Direct Type Approval costs within the EU can amount to £80,000, based on an initial cost of £30,000, plus £2,000 for each additional country. The OIML Certificates of Conformity, however, ease the type approval process in many countries.

8.3 As part of the second consultation, four small businesses that manufacture weighing instruments were specifically consulted regarding the cost of implementation. The overall view was that there would be little or no difference to their current costs.

9. Opportunities and Threats

9.1 Most respondents saw the implementation of the MID as both a threat and an opportunity. The opportunities include savings in costs and time to market, based on the advantage that one approval ensures compliance in all EU countries.

9.2 The perceived threat was that countries will regulate different instruments. So, there might be the case whereby a manufacturer of a MID compliant EGA would not be able to compete equally in a country that did not regulate EGAs in line with the MID, because it could well be in competition with a non-compliant EGA which would be cheaper and easier to make. However, where a Member State does not regulate in accordance with the MID, it cannot prevent compliant instruments being placed on its market or put into use.

10. Conclusion on Costs and Benefits

10.1 The comments received on the initial consultation were mixed as to whether the MID presented an opportunity or a threat. However, it was clear that there would be benefits to business of reduced regulatory burden, which would result in reduced time and costs of getting new products to the EU market. The Government accepts that prescription may not be the same across all Member States, since the optionality clause enables Member States to decide which instruments to regulate and for what purposes. However, where instruments are prescribed, the requirements will be identical. Where Member States do not prescribe them, no national regulation will be permitted, allowing MID compliant products to circulate freely alongside non-MID compliant products. There was, nevertheless, a concern expressed that non-compliant instruments would be cheaper to make and therefore would ultimately cost less, so that they undercut the cost of compliant instruments.

11. Business Sectors Affected

11.1 The main business sectors affected are manufacturers of exhaust gas analysers.

12. Small Firms Impact Test

12.1 We do not anticipate that this implementation will have any significant or complex impact on small firms, within the sectors affected by the proposed changes.

13. Identify Any Other Costs

Option 1

13.1 None.

Option 2 and 3

13.2 No additional cost for the exhaust gas analyser manufacturer. The costs of the designation and audit of Notified Bodies would be met directly by the Notified Bodies themselves. The costs of setting up a market surveillance programme would need to be met by the Member State, as well as the ongoing operation of the programme.

14. Competition Assessment

14.1 It is anticipated that exhaust gas analyser manufacturers would not incur any significant costs as a result of the proposed Directive.

Manufacturers already comply with the technical requirements of the International Recommendations of the OIML, on which the essential requirements of the Directive are based. The Directive will reduce barriers to trade by harmonising national legislative requirements at European level. It is not likely that implementation of the proposed Directive would result in any disproportionate costs or other effects between exhaust gas analyser manufacturers.

14.2 There is also a 10-year transitional period from the date on which the proposed Directive comes into force, during which exhaust gas analysers may be passed as fit for use for trade under current national legislation, which will permit manufacturers to make full use of any type approval certificates that have been issued before 30th October 2006.

14.3 In light of the above comments, it is not anticipated that implementation of the proposed Directive will have significant impact on competition within any affected markets.

15. Rural Proofing

15.1 There will be no impact on rural communities and businesses.

16. Summary and Recommendation

16.1 The responses received to the initial consultation document were very positive overall, with a substantial majority supporting the proposed approach to implementation. Evidence, provided in response to the consultation document, suggests that the time and costs of getting new products market will be reduced as a result of implementing the MID.

16.2 The recommendation is, therefore, to proceed with implementation along the following lines:

- Implementation on the basis of maintaining the status quo;
- Produce an individual SI for each category of instrument (including one for exhaust gas analysers).

17. Enforcement, Sanctions, Monitoring and Review

17.1 These activities are already carried out on similar instruments currently controlled under national Weights and Measures legislation and will equally be applied to exhaust gas analysers and the other measuring instruments regulated under the MID.

18. Contact

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DECLARATION

I have read the Regulatory Impact Assessment and I am satisfied that the benefits justify the costs.

Signed by the responsible Minister: S. J. Ladyman
Date: 4th August 2006

TRANSPOSITION NOTE

Directive 2004/22/EC of the European Parliament and Council on measuring instruments.

These Regulations transpose the Measuring Instruments Directive (MID) (2004/22/EC – OJ No. L135, 30.4.04). The Secretary of State is responsible for taking measures to implement the MID in relation to the making of Regulations, the appointment of notified bodies, enforcement of provisions and market surveillance. Articles of the Directive not relevant to these Regulations have not been referred to within this transposition note. Administrative actions that are the responsibility of the Secretary of State are not included within the Regulations.

Article	Objectives	Implementation
1	Specifies scope of the directive in respect of measuring instruments controlled.	Regulation 3(1) Regulations apply to Exhaust Gas Analysers for use for the protection of the environment and public health within MI-010 and first placed on the market after 30 October 2006.
2	Specifies scope of the directive in respect of the tasks for which measuring instruments are prescribed.	Regulation 3(1) Regulations for Exhaust Gas Analysers within MI-010 only apply to analysers intended for use for protection of the environment and public health.
3	Sets out the essential requirements for measuring instruments to be placed on the market and put into use The directive provides requirements for electromagnetic immunity.	Schedule 1 This provision is given effect by regulation 33 of the Measuring Instruments (Automatic Gravimetric Filling Instruments) Regulations 2006 (one of the set of Regulations implementing the MID). This provides that the provisions of Directive 89/336/EEC are disapplied in relation to the electromagnetic immunity of measuring instruments by amendment of the Electromagnetic Compatibility Regulations 2005 (EMC Regulations) in respect of instruments for which the Measuring Instruments Directive has been implemented. The emission requirements of the EMC Regulations continue to apply to measuring instruments.
4	Definitions	Where applicable, included within regulation 2
5	Applicability to sub-	Not relevant

	assemblies	
6	Essential requirements and assessment of conformity	Regulations 5 and 6 and Schedule 1.
7	Conformity marking	Regulation 12 and 13 and Schedule 4.
8	Placing on the market and putting into use	Regulation 4 Regulation 3(3) disapplies the obligations in relation to non-compliant instruments displayed at trade fairs and exhibitions subject to certain conditions.
9	Conformity assessment	Regulation 6 and Part 2 of Schedule 2.
10	Technical documentation	Regulation 6(2) and Schedule 3
11	Procedure for the designation of notified bodies	Regulations 7, 9 and 10
12	Criteria to be satisfied by designated bodies	Regulation 7 and Part 1 of Schedule 2
13	Harmonised Standards and Normative Documents	Regulations 2(1), 5 and 6
17	Markings	Regulation 12 and Schedule 4
18.1 18.2, 18.3 and 18.4	Market surveillance Administrative cooperation	Regulations 15, 16 and 19 Not relevant
19.1 19.2	Safeguard clause Administrative provisions for Commission	Regulations 15 and 16 Not relevant
20	Unduly affixed markings	Regulations 15 and 16
21	Decisions entailing withdrawal from the market or prohibition or restriction on placing on the market of non-compliant measuring instruments	Regulations 15 and 16 and Part 2 of Schedule 2.
22	Repeal of Directives	Not relevant
23	Transitional provisions	Regulation 3. The Regulations do not apply to instruments placed on the market before 30 October 2006 or instruments placed on the market after that date which comply with current national approvals.
24.1	Transposition	Regulation 1. The Regulations come into force on 30 October 2006 except Regulations for the designation of notified bodies which come into force

		on 7 September 2006.
24.2	Administrative action for member states	Not relevant
Annex I	Essential Requirements	Schedule 1
Annex MI-010	Requirements for exhaust gas analysers	Regulation 2 and Schedule 1

Annex A

List of Individuals/Organisations consulted

A & D Instruments Ltd
Abbey Precision Components Ltd
Accrapak Systems Ltd
Actaris UK Ltd
ADT Fire and Security
Aeroplas (UK) Ltd
Akvila Osakeyhtio
Alan Thorogood Associates
Alentec Orion Ltd
Alfons Haar
All-Fill International Ltd
Alpeco Ltd
Amp-Rose
Ancholme
APEA
Arc International
ASDA ISD Retail Systems
Association of Licensed Multiple Retailers
Association Of London Government (ALG)
Association Of UK Oil Independents
Automated Material Handling Systems Association (AMHSA)
Automobile Association
Avery Weigh-Tronix
Axflow Ltd
Barry-Wehmiller Europe (St. Albans) Ltd
BB Plastics
Beaumont TM Ltd
Biomar Ltd
Biscuit, Cake, Chocolate & Confectionery Association (BCCCA)
Bizerba (UK) Ltd
Body Shop International Plc
BP Chemicals
Brighton & Hove City Council
British Association Of Colliery Management
British Beer & Pub Association
British Cement Association
British Chambers of Commerce
British Chemical Distributors & Traders Association (BCDTA)
British Coatings Federation Ltd
British Frozen Food Federation
British Hospitality Association
British Lubricants Federation Ltd
British Marine Federation
British Ports Association
British Potato Council
British Poultry Council
British Precast
British Retail Consortium
British Shippers Council
British Standards Institution (BSi)
British Steel Plc
British Sugar Plc
Brunner Mond (UK) Ltd

Builders Merchants Federation
Capital Meters Ltd
Carrs Fertilisers Ltd
Centek International
Chance & Hunt Ltd
Chartered Institution of Waste Management (CIWM)
Chronos Richardson Ltd
Cintex Ltd
Citizens Advice Bureaux
Citizens Advice Scotland
Clyde Richard Simon & Sons Limited
Coal Merchants Federation (GB) Ltd
Combined Edible Nut Trade Association (CENTA)
Confederation of British Industries (CBI)
Confederation of Paper Industries (CPI)
Control Solutions Instruments
Convention of Scottish Local Authorities (COSLA)
Cosmetic Toiletry & Perfumery Association (CTPA)
County Surveyors Society Waste Management
Dairy Crest Limited
Dairy UK
Darenth Weighing Services Ltd
Dart Data Systems
DEFRA
Delford Sortaweigh Ltd
Dell Engineering Ltd
Department for Transport (DfT)
Department of Enterprise, Trade & Investment, N Ireland - DETI(NI)
Digi Europe Ltd
Dresser Wayne Pignone
Driver Southall Ltd
DSM Nutritional Products
DTI Oil & Gas Directorate
Easiweigh Ltd
East Sussex County Council
Egbert H Taylor & Co Ltd
Elaflex Ltd
Electricity Association Services Ltd
Elster Metering Ltd
Emco Wheaton UK Ltd
Energy Institute (EI)
energywatch
Environment Agency
Environmental Services Association
Espera Scales Ltd
Essex County Council
European Snacks Association
F A Sening
Federation of Bakers
Federation Of Licensed Victuallers Association (FLVA)
Federation Of Petroleum Suppliers Ltd
Fisco Products Ltd
Flintab Ltd
Flomat Bagfilla International Ltd
Food & Drink Federation (FDF)
Food Processors Association

Food Standards Agency (FSA)
Forecourt Equipment Federation (FEF)
Forum Of Private Business
Freight Transport Association
Fresh Produce Consortium (UK)
Fuelling Components Ltd
Fuelmasters
Fujitsu Services
G Owen & Sons
G Webb Automation Ltd
Gainsborough Craftsmen Limited
Gambica
Garage Equipment Association
GEI Albro
Gilbarco Veeder-Root
Gin & Vodka Assoc (GVA)
Glasgow Caledonian University
Golconda Ltd
Grain & Feed Trade Association
Guernsey Trading Standards Service
H & H Services Ltd
H Rudebeck & Company Limited
Hayssen Europa Ltd
Herbert Group
Hertfordshire County Council
HM Revenue & Customs (HMRC)
Home Grown Cereals Authority
Horstmann Controls Ltd
Hydropolmers Ltd
IBM UK Laboratories Ltd
IBM UK Ltd
Independent Tank Storage Association
Institute Of Consumer Affairs (ICA)
Institute of Quarrying
Intervention Board
Invicta Plastics Ltd
IoP: The Packaging Society
Isle of Man Office of Fair Trading
Jagger & Jagger
Jersey Trading Standards Department
John Artis Ltd
Kelloggs Europe Trading Ltd
Kemira Northern Ireland
Kingswinford Engineering Ltd
Kliklok International Ltd
LACORS
Lakeland 2000 Ltd
Local Government Association
Lock Inspection Systems Limited
Loma Engineering
Macquarie Bank Ltd
Maidment Tanker Services Ltd
Manchester Metropolitan University Dept
Margarine & Spreads Association
Matam Ltd
Meller Flowtrans Ltd
Metal Detection Ltd

Mettler Toledo Ltd
Milltronics Ltd
Mitchell & Cooper Limited
Mount Packaging Systems Ltd
Multipond Ltd
National Association of British & Irish Millers (nabim)
National Association of Licensed Opencast Operators
National Consumer Council
National Consumer Federation
National Farmers Union
National Power
NCR
Northern Ireland Local Government Association (NILGA)
OCS Checkweighers Ltd
Office of Fair Trading (OFT)
Ofgem
OMYA UK Ltd
ONDEO Nalco Energy Services Ltd
P S Process Improvement Ltd
Packaging Federation
Paint Research Association
Pasabahce Cam Sanayii Ve Ticaret AS
Permex Limited
Petrol Retailers Association (PRA)
Petrol Services Ltd
PIAB UK Ltd
Plastico
PM Onboard Limited
Poole Borough Council
Potato Processors Association
Powergen Plc
Practicon Ltd
Precia-Molen UK Ltd
Premier Foods
Premier Tech 2000 Ltd
Processing & Packaging Machinery Association (PPMA
Procon Engineering Ltd
Provision Trade Federation
Public Carriage Office
Pumptronics
Qualipack
Quarry Products Association
Ragus Sugars
Railweight
RDS Technology Ltd
Red Forge Ltd
Retail & Forecourt Solutions Ltd
Retail Motor Industry Federation (RMIF)
Retail Petroleum Solutions (UK) Ltd
Road Haulage Association (RHA)
Robinson Plastic Packaging Ltd
Roltex Belgium N.V
Royal Automobile Club
RWL Ltd
SAHM
Sainsbury's Supermarkets Ltd
Scanvaegt GB Ltd

Schneider Ltd
Scotch Whisky Association
Scotland Office
Scottish Beer & Pub Association (SBPA)
Scottish Consumer Council
Scottish Executive
Scottish Licensed Trade Association
Scottish Motor Trade Association
Sealed Air Corporation
Sensus Metering Systems Ltd
Severn Trent Metering Services Ltd
Siemens Energy Services
Sira Certification Service
Sira Instrument Test & Calibration
Society of British Water & Wastewater Industries (SBWWI)
Society Of Motor Manufacturers & Traders
Somerset County Council
SP Filling Systems Ltd
Sparc Systems Limited
Strangeways Associates Ltd
Sulo MGB Ltd
Sussex & Berkshire Machinery Ltd
SWIG
Syspal Ltd
Tasca Tankers Ltd
Tecalemit Garage Equipment Co Ltd
Tesco Stores Limited
Thermo Electron
Timeplan Ltd Phil
TMG Marchesini UK Ltd
Tokheim UK Ltd
Tong Engineering
Total Butler Oil Products
Trades Union Congress (TUC)
Trading Standards Institute (TSI)
Triscan
U Group Ltd
UK Baking Ind. Consultative Committee
UK Cleaning Products Industry (UKCPI)
UK Petroleum Industry Assoc (UKPIA)
UK Weighing Federation Ltd (UKWF)
UKAS
Uniquema Ltd
United Kingdom Warehouse Association
Utopia Tableware Ltd
W J Morray Engineering Ltd
Wales Office
Webster Griffin Ltd
Welsh Assembly Government
Welsh Consumer Council
Welsh Local Government Assoc. (WLGA)
West Sussex County Council
West Yorkshire Trading Standards Service
WHICH
WRC
Wrights Dowson Group
Yamato Scale Dataweigh (UK) Ltd