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**REPORT TO THE EDEN COMMITTEE ON METROLOGICAL CONTROL OF
EQUIPMENT FOR USE FOR TRADE - GOVERNMENT RESPONSE**

On 26 April last year I circulated to H Committee a summary of the Eden Report (concerning weighing and measuring equipment for use for trade) which was subsequently published as Command Document (Cmd. 9545). The Deregulation White Paper "Building Businesses - Not Barriers" commits us to publishing a response by August and I now attach the draft Response.

Colleagues will see that the majority of proposals have been accepted either wholly or in part, although we have not accepted the Committee's proposal that a new QUANGO be created, nor do we intend to amend the terms of reference of an existing one. In deciding which of the Recommendations to implement the Department has sought to reduce burdens on businesses and encourage innovation while ensuring that the consumers' interests remain adequately protected. Preliminary compliance cost assessments have already been sent to the Department of Employment.

This draft Response allows detailed consultations with interested parties and in particular with local Authorities who have responded positively. Further consultations will of course take place once more detailed proposals are available in a few months time and officials from here will be discussing with the Home Office the passages covering offences.

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A new Weights and Measures Bill will be required and I shall of course be seeking policy clearance from H Committee for the Bill (which also incorporates some non-Eden related changes) later in the year.

I should be grateful for your, and colleagues endorsement that the Government Response be published. To meet the August deadlines I propose that the Response be published on 24 July so it would be helpful to have clearance to publish by the end of this month.

I am copying this letter and the draft Government Response to the Prime Minister, members of H Committee, Richard Luce and Sir Robert Armstrong.

Lucas
Michael

LORD LUCAS OF CHILWORTH

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MANAGEMENT IN CONFIDENCE

METROLOGICAL CONTROL OF EQUIPMENT FOR USE FOR TRADE

Government Response to the Report of the Eden Committee.

Introduction

On March 13 1984, Alex Fletcher MP, then Parliamentary Under-Secretary of State for Corporate and Consumer Affairs, announced the setting up of the Committee on Metrological Control of Equipment for Use for Trade. The Committee comprised representatives from all interested parties - manufacturers, installers, repairers, users, central and local government, consumers and an independent member under its independent chairman, Dr E N Eden CB. The terms of reference were:-

- (i) To review those provisions of the Weights and Measures Act 1963, as amended by Sections 16 and 17 of the Weights and Measures Act 1979, concerned with pattern approval, testing, stamping and inspection of weighing or measuring equipment for use for trade, taking account of the impact of modern technology.

Note: At the time the report was written, the Weights and Measures Acts in force were those of 1963, 1976 and 1979. These have since been consolidated - without any change in the powers - in the 1985 Act. All references in the report to the 1963 and 1979 Acts should be read as to the 1985 Act.

(ii) To examine alternative methods of metrological control, including self-certification by manufacturers that might be applied in future to weighing or measuring equipment and their effect on legal provisions.

(iii) To make recommendations to the Department of Trade and Industry and report by 31 December 1984.

The aim was to review the need for new provisions, more attuned to modern technology and trading conditions, in the field of metrological control of weighing or measuring equipment used for trade. Developments in technology, particularly the advent of microelectronics, have placed great strains on the traditional methods of assessing the accuracy and suitability of such equipment. The Committee examined the shortcomings of the current system and proposed methods of metrological control which they thought could provide an effective alternative for many years to come.

The committee sat throughout 1984 and presented their unanimous report to the Parliamentary Under-Secretary of State for Trade and Industry, Lord Lucas of Chilworth, in early 1985. The report was published by HMSO in June 1985 (Cmnd 9545). Simultaneously, the Department of Trade and Industry set in motion a public consultation exercise. A press release announced the publication and invited comments. Some 500 letters were written to

manufacturers, users and other individual and corporate interested parties. 97 substantive replies were received of which all but a handful were broadly in favour of the bulk of the committee's recommendations.

The Government welcomes the Report which gives a thorough and professional assessment of the problems of control in this area. It is especially apt that the first steps to implementing the reforms recommended, which should be of widespread benefit can be taken in 1986 - Industry Year.

In taking action on the Report, the Government will pay particular attention to alleviating burdens on business, especially small firms wherever possible. It believes this can be achieved without in any way reducing confidence in fair trading. The recommendations help to promote the Government's policy of encouraging industry to install Quality Assurance systems certified by bodies accredited by the National Accreditation Council for Certification Bodies, thus raising the quality of goods and services and increasing international competitiveness. The Government will implement the recommendations in such a way as to encourage competition and innovation.

The Report has a number of implications for local authority Trading Standards Officers ("inspectors"), who are the cornerstone of the regulatory system of equipment in use for trade. The Government wishes to capitalise on their experience and expertise in this area,

to enhance their developing role in offering an advice service to industry on regulatory matters, to remove the requirement for unproductive tasks and thus to allow local authorities to use their manpower more effectively. Therefore, the Government places great stress on the optimum involvement of inspectors in new arrangements arising from this report.

The Government is strongly committed to the removal of technical barriers to trade. Therefore new schemes will be available to foreign manufacturers on the same basis as to home manufacturers. While adopting the spirit of the recommendations entirely, the Government will be prepared to alter detailed implementation plans at any stage if it appears expedient to advance harmonisation of the regulatory framework within the European community.

The action which the Government proposes to take on this Report will undoubtedly be helpful to industry. However, the Government will take no step which could compromise fair trading. Indeed, this will be promoted by the raising of the quality of manufactured goods and services which should result. The Government believes that the basis of fair trading is the acceptance by all parties that the regulatory framework is reasonable. It is therefore especially pleased that the Report was unanimous and that reform in this area can be accepted by all interested parties without controversy.

Government Response to the Recommendations

Recommendation 1

We recommend that pattern approval by the Secretary of State be retained.

Government response: accepted

This confirms the findings of the recent Rayner Scrutiny of the National Weights and Measures Laboratory (NWML) that pattern approval requires the independence and authority of Government.

However, the Government will continue to seek ways of minimising burdens on equipment manufacturers by giving these more responsibility in pattern approval procedures wherever practicable. Some recent moves in this direction are covered in the response to Recommendations 2 and 3 below.

Recommendation 2

We recommend that:

- (i) The potential in in-process examination (IPE) be exploited by both industry and NWML to a greater extent than it is at present.

(ii) NWML and industry finalise the draft arrangements for accepting manufacturers' test and trials results.

(iii) The agreed arrangements for involving inspectors, as appropriate, in IPE work be put into immediate effect; and

(iv) NWML re-launch its IPE publicity campaign.

Government response: accepted

(i) NWML has already revised its application forms and guidance material to make its requirements clearer to submitters. This should help to raise the standard of submitters' supporting documentation which has been of very mixed quality. If this can be achieved, there should be benefits to all submitters in terms of increased processing speed.

(ii) This recommendation aims to put more responsibility on industry for getting its designs right first time and is especially welcomed. NWML has recently formulated specific proposals and is in the process of consulting industry. NWML is also considering how further aspects of the responsibility for certifying design can be placed in industry. This would be of advantage to firms with a good record of putting forward carefully-designed products which invariably meet NWML

criteria. Such firms could expect to obtain their approvals more quickly and cheaply.

(iii) Local authority inspectors already play a part during many examinations, to the mutual benefit of submitter, inspector and pattern examiner. It would, however, be a waste of resources for inspectors to be routinely involved in

every pattern examination. NWML is currently discussing with inspectors how their contribution can be optimised.

(iv) NWML has revised its brochure explaining how the IPE scheme works and will be launching the new brochure by the spring of 1986.

Recommendation 3

We recommend that, on specialist equipment, NWML maintain a flexible approach to pattern examination, adjusting its requirements wherever possible and drawing as appropriate on the expertise of the home authorities.

Government response: accepted

NWML has been adopting a progressively more flexible approach to the examination of specialist equipment in recent years and the endorsement of this trend by the Committee is welcomed. Similarly, the

involvement of home authorities is almost invariable in the case of specialist equipment. NWML recognises the burden on manufacturers of one-off or several-off items of equipment which pattern approval imposes and intends to minimise these burdens wherever consistent with maintaining confidence in fair trade.

Recommendation 4

We recommend that the details of a scheme to give approval to parts of weighing or measuring equipment be worked out.

Government response: accepted in principle

NWML is already able to issue certificates of compliance (with any specification) to components or peripherals of weighing and measuring equipment under S6 of the Weights and Measures Act 1985. It will shortly seek accreditation by the National Measurement Accreditation Scheme (NAMAS) for carrying out tests and issuing certificates of calibration. A certificate of compliance with NWML's Design Assessment Criteria is the nearest practical thing to an approval of a part. Equipment submitted consisting entirely of parts already bearing such certificates may in some cases be able to be approved after only a limited examination or even as a paper exercise. This should smooth the flow of work to NWML and give commercial advantages to manufacturers of "certified components", especially when exporting. Occasionally, it would also save

approval time and fees although not frequently since NWML never repeats tests unnecessarily on parts it has already examined. There is no bar to this procedure being used at present but because of the way pattern approval has grown up no manufacturer has ever used the system in this way. Therefore, NWML will discuss with manufacturers whether to alter administrative procedures to maximise the benefits derived from the above arrangements, whilst still maintaining existing flexibility.

However, the Government considers that a change in the law to permit pattern approval of components of equipment is neither necessary nor desirable. There are very few components which could sensibly be said to be "suitable for use for trade". This can usually only be determined in the context of a complete machine.

NWML will also discuss with manufacturers, repairers and inspectors whether advantageous changes to the law on reverification following repair can be based on a parts certification scheme.

Recommendation 5

We recommend that applications for pattern approval (including those for modifications) be restricted to manufacturers or to their authorised representatives and that the Certificates of Approval be granted to them.

Government response: accepted in part

For some years, it has been NWML practice to ensure that the approved machine should bear the name of the submitter. One reason for this was to discourage anyone other than the original submitter from marketing an allegedly approved machine without contacting NWML (who would be able to verify that the new submitter's machine did conform in all essentials to the approved pattern). Acceptance of this recommendation would give this practice a basis in law and would align national pattern approvals with EC approvals.

However, the intention behind this recommendation may have been stronger - to prevent third parties from seeking pattern approval for a modification of an already approved design from another submitter. The Government will not ~~im~~plement such a restriction. It would be anti-competitive and would have reduced the pace of innovation in some fields significantly in recent years.

Recommendation 6

We recommend that consideration be given to incorporating disclaimers on safety in Certificates of Approval.

Government response: accepted

The Department has no responsibility for testing the safety of equipment submitted for assessment of its suitability for use for

trade. A safety disclaimer will therefore emphasise that NWML has not tested for safety.

Recommendation 7

We recommend that manufacturers assume responsibility for conformity of their production models with the approved pattern, and be subject to appropriate sanctions.

Government response: accepted

The Government accepts the Committee's proposition that it is unrealistic to expect inspectors to bear the onus of checking conformity given the complexity of modern electronic equipment. Changes in the law are required to reduce significantly the risk of unauthorised design changes. All manufacturers will be required to keep records of all design changes and to make these available to the Secretary of State or to inspectors on demand. It will be an offence for a manufacturer to seek stamping of equipment (or supply on the basis of suitability for stamping) where the design differs materially from an approved pattern. Inspectors will have powers to impound equipment where reasonable grounds exist for suspecting non-conformity. The Secretary of State will take powers to require the manufacturer to take reasonable steps to draw users' attention to the non-conformity. Officials' powers will be used only when essential so that none of this will be a burden on the responsible manufacturer.

Recommendation 8

We recommend that a self-verification system, agreed by interested parties, be set up.

Government response: accepted

The Government believes that the implementation of this recommendation will be a valuable reduction in burdens on business which can be achieved without in any way compromising fair trading. The costs of operating such a scheme (which should be very much less than the current costs of verification) will be recovered in full through an accreditation fee.

Recommendation 9

We recommend that the self-verification system be available to organisations which:

- (i) are accredited and audited in accordance with BS 5750 or such other quality assurance system as may be determined;
- (ii) have their accreditation undertaken by NWML in association with appropriate local authority inspectors;

(iii) are audited by the appropriate local authority inspector, assisted as necessary by NWML. To achieve uniformity, co-ordination could be on the lines of that provided by the NMCU under the Weights and Measures Act 1979.

Government response: accepted

(i) and (ii) Accreditation to self-verify will depend on the applicant satisfying the Secretary of State about

(a) quality assurance

(b) the traceability of testing equipment to National measurement standards

(c) the procedures for ensuring conformity with an approved pattern

(d) the adequacy of the testing regime for ensuring that self-verified equipment meets the relevant Regulations

It is essential to ensure that a self-verifying organisation has a quality assurance system of demonstrably high standards. The Government believes that this should be achieved through adherence by the organisation to BS 5750, the national standard for Quality Systems. This will be one part of a guarantee of the high equipment standards required to ensure fair trading and will also help to raise standards and efficiency of the organisations generally. Any organisation holding a certificate of adherence to BS 5750 (in association with an appropriate technical schedule) issued under a scheme accredited by the National Accreditation Council for

Certification Bodies (NACCB) will meet requirement (a). Foreign manufacturers will be able to participate either through BS 5750 or an equivalent national scheme where a reciprocal recognition agreement has been negotiated.

In introducing Quality Assurance procedures in this area, there is a special opportunity to benefit from inspectors' accumulated experience in the verification of equipment and of Quality Assurance procedures in the control of packaged goods. Therefore, the Government believes that in many cases, especially for small firms undertaking straightforward manufacturing installation or repair processes, it will be efficient for Quality System Assessments to be carried out by appropriately trained inspectors.

The Government has noted with satisfaction the increasing scope and application of BS 5750 certification, particularly its adaptation to small and specialised firms. Therefore, it will encourage the collaboration of the inspectorate and certification bodies in developing streamlined schemes based on BS 5750 with the intention that such schemes should become accredited by the NACCB. In addition to guaranteeing high standards, the right to use the NACCB logo should be to firms' commercial advantage.

The Government's dual aim is to alleviate a burden on industry and to promote fair trading by raising standards. It will

therefore encourage maximum participation in the self-verification scheme by ensuring that the arrangements for assessment of organisations' Quality Assurance procedures are as streamlined as possible.

The other conditions (b),(c),(d) will be judged following an assessment of the applicant by NWML and the local inspector.

(iii) Self-verifying organisations (SVOs) will have to continue to satisfy the initial requirements in order to maintain their accreditation. Regular assessments by the certification body will in any case be necessary to maintain the QA certificate. In addition, all self-verified equipment will have to be notified to an inspector so that a sample can be subjected to a statutory check verification. The evidence gathered in these exercises will be used to assess the SVO's fitness to self-verify. The inspector will have powers to issue instructions to a SVO regarding verification procedures and powers to embargo equipment where the spot checks have revealed an unsatisfactory performance by the SVO. This surveillance procedure is very much along the lines of that very successfully operated for the "Average System" of quantity control of packaged goods (introduced by the Weights and Measures Act 1979). The Government accepts that there should be co-ordination of the programme of surveillance so as to ensure nationwide consistency and will discuss with local authorities how this should be achieved. Also needed are powers of

conciliation and arbitration between an aggrieved SVO and an inspector along the lines of those for the "Average System".

Improper use of the power to self-verify will be an offence.

The Government recognises that inspectors will need training for the additional functions connected with self-verification envisaged above. It will discuss with local authorities how this should be organised and funded.

Recommendations 10 and 11

We recommend that the self-verification system have supervisory arrangements for providing advice to the Secretary of State and for dealing with such matters as registration, co-ordination, appeals and other matters relevant to the general operation of the system. We have identified three alternative arrangements:

- (i) NWML and NMCU with a revised constitution covering the function, with a requirement to consult an Advisory Committee that reports to the Secretary of State and draws its members from the interested parties;
- (ii) NMCU with a revised constitution;
- (iii) a Commission similar to that described in S.7 of the Weights and Measures Act 1963, but with a revised constitution.

We recommend that, since the necessary functions could be fulfilled by each of the alternatives, a final decision on which to adopt should be primarily determined by government policy. The decision should however bear in mind the following requirements:

(i) adequate representation and influence should be provided for all interested parties (eg NWML, local authority inspectors, industry, users, consumers);

(ii) meet the government's policy requirements within the spirit of the White Paper on Standards, Quality and International Competitiveness;

(iii) operate with minimum of cost and bureaucracy.

Government response: accepted in principle

The scheme certainly needs satisfactory arrangements for providing the Secretary of State with an overview of its operation and for dealing with disputes and other matters. However, the Government believes that the approaches set out would be bureaucratic and are not in harmony with its policy of reducing burdens on business. Instead, the Secretary of State will rely on arrangements for co-ordination of individual aspects of the scheme. QA Certification Bodies have oversight arrangements which cover the need as far as QA aspects are concerned (and they are themselves overseen by the

National Accreditation Council for Certification Bodies). There will also be oversight of surveillance of verification as discussed in the response to Recommendation 9. In addition, the scheme will be kept under review so as to ensure that desirable improvements are brought forward.

Recommendation 12

We recommend that the self-verification system be optional initially but with the Secretary of State being required to review its operation within three years of commencement and being empowered, after consultation, to make the system mandatory for weighing and measuring equipment for use for trade.

Government response: accepted in principle

The Government accepts that the scheme must be optional (on the submitter) initially and will keep an open mind about whether it should eventually become mandatory. A mandatory scheme would allow local authority manpower to be used more effectively. However, it might be difficult to make it consistent with the Government's obligations to GATT and the EC and might impose more burdens than it removes on some small firms. This will only be determined in the light of experience and an initial review after 3 years of operation seems about right.

Recommendations 13 & 14

We recommend that the self-verification system:-

- (i) be applied initially to manufacturers. This will include consideration of manufacturers both at home and abroad;
- (ii) in its application to manufacturers, include any repairs undertaken by them on an accredited site. The system could be extended to installers provided there were control of the accuracy, storage and use of their equipment.

We recommend that the Secretary of State be required to decide within three years of the start of self-verification system, after consultation, whether other repairers should be included.

Government response: accepted in part

In line with its policy of removing technical barriers to trade wherever possible, the Government intends to make the scheme available to foreign manufacturers on the same basis as to UK manufacturers. The Government, however, sees no reason why the scheme should be restricted initially to manufacturers. Any firm which can demonstrate that it is capable of satisfying the stringent standards which will be required should be allowed to take part in the scheme. The Government does accept that the schemes for manufacturers, installers and repairers will be somewhat different in character.

Recommendation 15

We recommend that notwithstanding the introduction of self-verification, testing and stamping by a local authority inspector be retained in appropriate circumstances.

Government response: accepted

While the scheme is an optional one, firms which have not been accredited to self-verify will get their equipment stamped by the inspector in the traditional manner. If self-verification eventually becomes a mandatory requirement, there will be no need for this in normal circumstances. However, the power will be retained so that an organisation whose accreditation has been withdrawn as a result of a serious breach of the conditions of the scheme (set out in the response to Recommendation 9) can still get its equipment onto the market.

Recommendation 16

We recommend that greater use be made of the powers in s.14 of the 1963 Act to make regulations governing "the purposes for which particular types of weighing or measuring equipment may be used for trade" and "the manner of erection or use of weighing or measuring equipment used for trade".

Government response: accepted

The report recognises that there is already a trend in this direction. As regulations are revised, due attention will continue to be paid to this point. In line with Government policy, the aim will be to impose the minimum restrictions consistent with fair trading.

Recommendation 17

We recommend that the use of batch sampling techniques for initial verification be extended.

Government response: accepted

Batch sampling for measures of length has recently been introduced under EC regulations. The Government has also proposed permitting batch sampling for beer glasses and will keep in mind other candidates as regulations are revised and discussions are pursued in international fora. Only mass-produced items from a well-controlled manufacturing process with the expectation of a very high degree of uniformity would be suitable.

Recommendation 18

We recommend that there be a statutory duty for local authorities to inspect equipment in use for trade at reasonable intervals. The

intervals should be reviewed, taking into account the complexity of equipment, its manner and intensity of use and its environment, and should be published in Codes of Practice following consultation with interested parties.

Government response: accepted

The report recognises the need for a regular check on the condition and operation of equipment in service to complement the new opportunities for industry to self-verify its products.

The Government does not believe that it is necessary or desirable to specify fixed intervals by statute. Local authorities must retain discretion to order their priorities as available resources permit. However, a Code of Practice would encourage uniformity and the local authorities will be asked to draw one up as a matter of priority.

The Government has considered and rejected an alternative proposal for an industry-run inspection scheme, financed by a licence fee payable by users. This would be inefficient since inspectors can check adherence to other consumer legislation on the same visit as inspecting weighing and measuring equipment. Furthermore it would apply pressure on users to accept service contracts from manufacturers or repairers and thus constitute a backdoor burden on business.

Recommendation 19

We recommend that evidence of inspection be provided, where appropriate, by a secure adhesive label applied when the equipment is first verified, and subsequently replaced when the equipment is inspected by the local authority inspector. The label should be readily visible to all users of the equipment, and should carry a prominent date mark to enable validity to be readily seen. The use of colours for different years could also be considered.

Government response: not accepted

Equipment will have to be identified and dated by the manufacturer/installer for the purpose of production control. The provision of an additional adhesive label would serve no regulatory purpose, but would perhaps indicate to informed members of the public the existence of an inspectorate and when the particular equipment was last tested. The value of this latter information is doubtful for the important issue is not when the equipment was last tested, but whether it is still accurate. Additional negative factors are the cost of providing the labels, and the difficulty of ensuring that such labels are properly secured (although there is no recommendation for a penalty in default) in all manner of trading conditions.

Recommendation 20

We recommend that all the present powers of weights and measures inspectors as defined in the 1963 Act (as amended by the 1979 Act) remain. It may be necessary to give inspectors additional powers in connection with their duties to undertake the quality audit of organisations.

Government response: accepted

Powers to allow inspectors to test and stamp prescribed equipment in use for trade must remain, at least until the Secretary of State has reviewed the working of self verification after three years, to deal with that sector of the trade which will continue to operate outside the proposed self-verification arrangements. Even if the self verification scheme becomes mandatory, it will still be necessary to retain existing powers to deal with those whose authority to self verify is withdrawn (see Response to Recommendation 15). Additional powers would be necessary to permit inspectors to check the quality of production by those manufacturers/installers/repairers who are verifying their own products and for other purposes discussed above.

Recommendation 21

We recommend that steps be taken to prevent the deliberate adjustment of equipment within its permitted measurement tolerances

to bias the average error in one direction known as exploitation of the tolerance.

Government response: accepted in principle

This problem arose in the context of petrol pumps and has been solved by reducing the tolerances which apply at the time of verification. There is no evidence that there is a similar problem with any other type of equipment. The Government will not hesitate to take appropriate measures if such a problem arises in future. The Government's policy is to harmonize measurement tolerances with international standards. It is expected that they will be reviewed from time to time in line with technological progress.

Recommendation 22

We recommend implementation of s.19 of the 1979 Act on the measurement of beer or cider.

Government response: premature to accept or reject.

The Government remains strongly in favour of a self-regulatory solution to the issue of serving a fair measure of beer. Such a solution is being explored at present and the implementation of this measure (now S.43 of the 1985 Act) will not be considered while that remains a good possibility.

Recommendation 23

We recommend that the whole field of measurement be reviewed to establish a rational approach to legal control; the weights and measures acts cover only part of the field.

Government response: accepted

Control of measuring instruments is the responsibility of a number of Government Departments and public bodies. There are very good reasons for this and different methods of control are appropriate in different cases. These are being reviewed to ensure that there are no unjustifiable discrepancies between different areas and that best practice in one area can be copied, wherever appropriate, in others. Major reallocations of responsibility for enforcement are not expected to result from the review.

Recommendation 24

We recommend that the types of equipment prescribed under the 1963 Act be reviewed to identify candidates for addition or deletion.

Government response: accepted

The Government is fully committed to reducing Burdens on Business and believes that the requirement for testing and stamping should

only be imposed whenever essential. However, it recognises that many organisations find prescription helpful and would suffer increased burdens, on balance, by its removal. The Government believes that it will be possible in some areas for manufacturers and users to agree a specification for performance and standards of quality based on BS 5750 and existing equipment specifications. The Government is keen to explore and encourage such opportunities and to deprescribe wherever such voluntary methods of regulation are sufficient to guarantee fair trading. Regular calibration by a NAMAS-accredited laboratory is another possible alternative to prescription which the Government will consider. No changes will be made without consultation and a careful assessment of the costs and benefits.

The Government is aware of some instances where controls on equipment have been superseded by other protective measures and are no longer relevant (Egg-grading machines give the best known example). Such double burdens will be removed.

Implementation

The Department of Trade and Industry has already started to implement those recommendations on pattern approval procedures which do not require a change in the law. Other recommendations can be implemented by administrative action or statutory instrument, following any necessary consultation on detail. However, several of the recommendations, notably the introduction of a self-verification scheme, do require new primary legislation. The Government will bring this forward as soon as possible. In the meantime, NWML will work out detailed proposals where necessary and consult interested parties as in the Table overleaf.

IMPLEMENTATION TIMETABLE

Recommendation

Consultation planned

Implementation by

1		None necessary
2-3	Some changes already implemented. Other proposals are under discussion with trade associations and inspectors	October 1986
4	Prepare proposals for discussion with trade associations	Mid-1987
5	None	Will require new W&M Act
6		September 1986
7	Prepare proposals for discussion with trade associations and inspectors by September 1986	Introduce voluntary procedure during 1987. Statutory basis will require new W&M Act
8-14	Prepare proposals for discussion with all interested parties by September 1986	Will require new W&M Act
15		None necessary
16		As and when
17	Revised Beer glass regulations are undergoing consultation	Beer glass regulations introduced late 1986 Others - as and when
18	Local authorities will be asked to draw up a code of Practice, consulting as necessary.	As a matter of priority
19		None necessary
20	In association with discussion on relevant proposals above	As for relevant proposals
21		As and when

IMPLEMENTATION TIMETABLE

Recommendation	Consultation planned	Implementation by
22	None	Depends on success of proposals for self-regulation
23	Review in progress. Should be completed by September 1986	Not yet determined
24	Prepare proposals for discussion with all interested parties by September 1986	Not yet determined

