



## EUROPEAN COMMISSION

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs  
Single Market Enforcement  
Notification of Regulatory Barriers

Message 201

Communication from the Commission - TRIS/(2024) 0413

Directive (EU) 2015/1535

Notification: 2023/0579/CZ

Forwarding of the response of the Member State notifying a draft (Czechia) to comments (5.2) of Romania.

MSG: 20240413.EN

1. MSG 201 IND 2023 0579 CZ EN 16-01-2024 16-02-2024 CZ ANSWER 16-01-2024

2. Czechia

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4. 2023/0579/CZ - I10 - Metrology

5.

6. Comment 1:

Based on an analysis of the project notified by the Czech Republic, we found that certain provisions are in conflict with international recommendation OIML R134 'Automatic scales for weighing road vehicles while in motion and measuring axle loads' and with national regulations in Romania, which are based on this international iLoL recommendation.

The main conflict concerns the values of the maximum permissible errors that differ in the draft of 0111-OOP-C010-23 (points 2.3 and 2.4) from those set out in the OIML International Recommendation R134 (in point 2.2.1.1 for accuracy class 10 and 2.2.1.2.2 for accuracy class F).

We consider that these differences may create advantages for measuring instruments metrologically tested/verified according to Regulation 0111-OOP-C010-23 and disadvantages for measuring instruments metrologically tested/verified according to the provisions of national legislation in force in Romania, which are in line with OIML International Recommendation R134. We think that the draft Regulation No 0111-OOP-C010-23 should be amended in order to align the provisions on maximum allowable errors with the provisions of the applicable reference document, namely OIML International Recommendation R134 edition 2006.

Answer to comment 1:

The Czech Republic has been using weigh-in-motion (WIM) scales as part of its national legislation to impose sanctions since 2010. In view of the fact that at the time this issue was not fully addressed by any international regulation (and it is not addressed to the extent necessary to this day by OIML R 134 of 2006), the Czech Republic decided to use the international document COST 323 (including the adoption of a selected uniform specification of the accuracy of the weights) for the processing of technical and metrological requirements for these measuring instruments, taking into account the relevant provisions of the US ASTM E 1318 standard and the usable recommendations of OIML R 134 of



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2006. The greatest permissible errors (for verification) set out in Article 2.3 have been laid down in the national regulation since 2010, in the currently revised regulation submitted for notification, the greatest permissible errors for the use (operation) of these measuring instruments have been added by Article 2.4.

In view of the fact that in principle no progress has been made in this field at the European standardisation level over the last 13 years (work on the draft European standard was started but never completed) and OIML R 134 has been under revision for several years now to add the requirements and technical specifications for the use of weigh-in-motion (WIM) scales. The Czech Republic's existing strategy has not changed in relation to the technical and metrological requirements for weigh-in-motion scales.

However, this does not mean that the Czech Republic is not ready to change its strategy. If the OIML R 134 document can be supplemented, approved and subsequently issued in relation to weigh-in-motion, the Czech Republic is ready to harmonise its national regulation with this international document more comprehensively. In order to improve expert support for weigh-in-motion solutions, based on 13 years of experience with their use for sanctioning and with the provision of metrological control (type approval and verification), last year the CMI nominated its expert representative to the OIML working group dealing with the revision of OIML R 134.

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In any case, thank you very much for the useful comments, which we will continue to work with.

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European Commission

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