



EUROPEAN COMMISSION

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

Message 103

Communication from the Commission - TRIS/(2024) 0599

Directive (EU) 2015/1535

Notification: 2023/0579/CZ

Forwarding of the observations of a Member State (Poland) (article 5, paragraph 2, of Directive (EU) 2015/1535). These observations do not have the effect of extending the standstill period.

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1. MSG 103 IND 2023 0579 CZ EN 16-01-2024 05-03-2024 PL COMMS 5.2 16-01-2024

2. Poland

3A. Ministerstwo Rozwoju i Technologii,
Departament Obrotu Towarami Wrażliwymi i Bezpieczeństwa Technicznego,
Plac Trzech Krzyży 3/5, 00-507 Warszawa,
tel.: (+48) 22 411 93 94, e-mail: notyfikacjaPL@mrit.gov.pl

3B. Główny Urząd Miar
ul. Elektoralna 2, 00-139 Warszawa

4. 2023/0579/CZ - I10 - Metrology

5. article 5, paragraph 2, of Directive (EU) 2015/1535

6. 1) Detailed notes on the document:

Point 2.4.1. of the document states:

'The parameter referred to in Article 3.15.2(e) must not exceed 1.5 times the stipulated value when using the measuring instrument.'

Note:

According to COST 323 and to OIML R 134-5 (Second Draft) point A.2.5 table A-2, the depth of ruts shall not exceed 4 mm.

Point 5.3.2.3 of the document states:

'Resistance to air humidity pursuant to Article 2.2 (?) is tested with the scales switched on with two 24-hour cycles of moist heat with a maximum temperature of 40 °C.'

Note:

The document does not indicate the air humidity values, nor does it indicate the procedure for humid air action in 24-hour cycles.

The OIML D 11:2013 paragraph 10.2 recommends using a specified humidity value in a single 48-hour cycle.

2) General notes on the document:

1. It should be noted that the Czech document concerns HSWiM, although it does not specify the speed of movement of weighed vehicles.

2. The draft provision assumes that the 'vehicle recognition device' is a component of the HSWIM scale (points 1.22, 1.27, 3.1, and so on).



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3. The scale must meet the metrological requirements at temperatures from -20°C to $+40^{\circ}\text{C}$. On the other hand, pressure transducers and other sensors must maintain their metrological characteristics in the temperature range from -20°C to $+60^{\circ}\text{C}$. The manufacturer can determine a larger temperature range for type approval purposes.
4. The HSWIM scale is to measure the vehicle's speed to determine whether this speed is within the $V_{\min}$ – $V_{\max}$ weight range. The operating speed indication error shall not exceed 2 km/h.
5. The maximum permissible error for the weight of the vehicle weighed in motion is 5 % during legalisation and 7 % in use. The maximum permissible error for axle load is 11 % during legalisation, and 15 % in use. The draft legal provision does not specify any other class of accuracy in HSWIM scales.
6. In the test of resistance to external influences, the effects which interfere with the operation of the instrument shall not lead to measurement errors exceeding the maximum permissible error referred to above.
7. Pressure transducers shall meet the requirements for a physical environment with high or very high vibration and shock (class M3).
8. The scales must be equipped with a temperature measuring device (it is not clear whether it is the air or ground temperature), and the scales itself must recognise and signal temperatures beyond the operating temperature range.
9. The scales shall have an enclosure that is protected against dust and temporary immersion in water with an IP67 rating, and the other parts of the unit must have IP54 protection.
10. The proposed provision provides for at least two laboratory tests not implemented in our project, i.e. random vibration resistance testing and impact strength test.
11. At least four types of control vehicles shall be used during the road test of the type-approval instrument:
 - a single two-axle vehicle;
 - a single three-axle or four-axle truck;
 - a tractor unit with a semi-trailer with at least three axles;
 - a single truck with a trailer with two or three axles.If the scales are to weigh vehicles carrying loads with a movable centre of gravity (e.g. liquids), then an appropriate vehicle, e.g. tanker, shall also be required.
Each control vehicle shall make at least 10 passes at each of the following three speeds:
 - $V_{\max}$
 - $V_{\min}$
 - speed close to the centre of the operating speed range.
12. The following control vehicles shall be used for legalisation:
 - a single two-axle vehicle;
 - a single three-axle or four-axle truck;
 - a tractor unit with a semi-trailer with at least three axles or a single truck with a trailer with two or three axles.Vehicles with a movable centre of gravity shall not be used for legalisation. Each vehicle shall perform at least 10 passes at two speeds close to $V_{\min}$ and $V_{\max}$.

European Commission
Contact point Directive (EU) 2015/1535
email: grow-dir2015-1535-central@ec.europa.eu