

FINAL DRAFT
RECOMMENDATION

51st CIML Meeting

Strasbourg 2016

SUBMITTED
FOR CIML
APPROVAL

Revision of R 59:

Moisture meters for cereal grain and oilseeds

(Information)



ORGANISATION INTERNATIONALE
DE MÉTROLOGIE LÉGALE

INTERNATIONAL ORGANIZATION
OF LEGAL METROLOGY

Result of CIML online voting

Revision of R 59: Moisture meters for cereal grains and oilseeds

CIML Preliminary online ballot

Deadline: 2016-07-15

Votes cast: 25 (Yes: 23 – No: 2), 3 abstentions, Did not respond: 32¹

Country	Vote
AUSTRALIA	Voted No on 2016-07-14 (With comments)
AUSTRIA	Voted Yes on 2016-07-12 (With comments)
BELGIUM	Voted Yes on 2016-06-09
CANADA	Voted Yes on 2016-06-13
CROATIA	Voted Yes on 2016-07-01
CYPRUS	Voted Yes on 2016-07-11
CZECH REPUBLIC	Voted Yes on 2016-07-13
DENMARK	Voted Yes on 2016-04-19
EGYPT	Voted Yes on 2016-06-16
FRANCE	Voted No on 2016-07-13 (With comments)
GERMANY	Voted Yes on 2016-07-01 (With comments)
IRAN	Voted Yes on 2016-06-17
JAPAN	Voted Yes on 2016-07-15 (With comments)
KAZAKHSTAN	Voted Yes on 2016-07-01
KOREA (R.)	Voted Yes on 2016-07-14
MONACO	Voted Yes on 2016-04-19
NETHERLANDS	Voted Abstain on 2016-07-07 (With comments)
NEW ZEALAND	Voted Yes on 2016-07-15
ROMANIA	Voted Yes on 2016-07-12
RUSSIAN FEDERATION	Voted Yes on 2016-07-07
SERBIA	Voted Yes on 2016-07-15
SLOVAKIA	Voted Yes on 2016-07-14
SLOVENIA	Voted Yes on 2016-06-08
SWEDEN	Voted Abstain on 2016-07-01 (With comments)
SWITZERLAND	Voted Abstain on 2016-07-11 (With comments)
UNITED KINGDOM	Voted Yes on 2016-07-13 (With comments)
UNITED STATES	Voted Yes on 2016-07-08
VIET NAM	Voted Yes on 2016-07-15 (With comments)

¹ Thailand was not a Member State when this ballot was put online (total 60)



Comments Form	
Comments on: TC 17/ SC 1/ p1 PDR OIML R 59 “Moisture Meters for Cereal Grain and Oilseeds” Acceptability of this document for forwarding to the CIML for final approval	
TC 17/ SC 1/p 1 Convenership: China, United States	Date of circulation: April 18, 2016 Comments due date: July 15, 2016
Organization:	TC17/SC1 Participating Country Comments
Contact Information:	Comments to OIML Preliminary Draft OIML R59

Country code	Page	Clause	Gen/Tech/ Edit	Comment	Reason for comment	Response
DE	12	R59-part 1 2.4	edit	The abbreviation “RH” appears twice. Please delete one.		Accepted
DE	14	R59-part 1 4.4	edit	The statement “ <i>each 2 % moisture interval should begin and end with an even number</i> ” would lead to the problem that the same even number would belong to two intervals. Please reduce this sentence to: <i>each 2 % moisture interval should begin and end with an even number</i> ”	For clarification and correct rating of results. Additionally, this contradicts the explanation on how for example the US are determining their intervals (from e.g. 12.1 to 14 %) (see Secretariat response to comment on CD7/ A.1.1)	Accepted
DE	17	R59-part 1 5.6 + 5.7	tech	In these paragraphs, the requirements for the minimum content of the measurement records differ slightly. In 5.7, the following points are required additionally: <ul style="list-style-type: none"> - unambiguous identifier of the measurement - unique identification of the instrument, - units of the measurement result - constituent labels (on multi-constituent meters). Please harmonize the wording and the content of both paragraphs. Maybe only one paragraph would be sufficient.	There should be no difference in minimum information of what is recorded in “recording elements” and what is stored in the data storage	Accepted Removed “unique identification of the instrument” in section 5.7.

Country code	Page	Clause	Gen/Tech/ Edit	Comment	Reason for comment	Response
DE	9	R59-part 2 A.1.1 sample selection	edit	As already commented to CD 7, how to handle the moisture ranges is still not clear. Please include the Secretariat response to the UK and DE comments to p.38/ CD7 as an explanatory note.	The Secretariat Response was helpful, so this clarification should be preserved for future readers of the Recommendation	Accepted Added explanatory note to Section A.1.1.
DE	9	R59-part 2 A.1.1 sample selection	edit	The statement “ <i>each 2 % moisture interval should begin and end with an even number</i> ” is in contradiction of the U:S-praxis as explained in the Secreatriat response (12.1 % is not an even number) Please reduce this sentence to: <i>each 2 % moisture interval should begin and end with an even number</i> ”	For clarification Otherwise the same even number would belong to two intervals	Accepted
DE	9	R59-part 2 A.1 A.2	edit	In A.1 the word “replicate” is used for repeated measurements, in A.2 it is called repetitions and also replicate measurements Please consider the use of only one term	Harmonization of terms for better understanding	I believe the correct wording is used in A.1. and A.2. repetition is repeating or being repeated while replication is an object copied or reproduced.
DE	9	R59-part 2 A.1.2 A.1.3 A.1.4	edit	In A.1.2 Accuracy test and in A.1.3 repeatability the general meaning and how it is calculated is well explained. But what is missing is a clear instruction what to do like it is done later on in A.2. Although it can be extrapolated from the text what to do, it would be better to have clear instructions. Please add something like: number of grain types: (only one or all as defined by the National responsible body?) number of samples per moisture intervall: number of repetitions for each sample on each instrument:	Harmonization within the document, unambiguous explanation of the test procedure	Accepted Test instructions are included in Section A.1.1 and another paragraph was added to this section for clarification. The instructions in A.1.1 apply to A.1.2, A.1.3 and A.1.4.
DE	8 - 59	R59-Part 3 4 – 13.17.3	gen	It would be nice if the tables of the test report format could also be provided in an editable format, such as a word- or excel-file for downloads on the OIML web site (maybe on PG workspace)	To ease the use of the test report format	The document is available in word format.
FR	12	R59-Part 1 4.1.1	Tech	Relative humidity at 30% seems to be a little too low with the risk to test a dried sample. For example ISO 712 requires 40% to 70%.	The reference conditions for test method for meters have to be the same as these recommended for the reference method (ISO 712).	No change at this stage of the Recommendation per directives.

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FR	13 16	R59- Part 1 4.2 g 4.7	tech	The temperature range of grain sample is not adequate	At 2°C the properties of the grain sample could be affected	No change at this stage of the Recommendation per directives.
FR	13	R59- Part 1 4.3	tech	A reference to the existing standards should be made.	ISO standard (ISO 712 for example) defines reference method for determination of moisture in grains.	No change at this stage of the Recommendation per directives.
FR	15	R59- Part 1 4.4.1 4.4.2	Tech	MPEs are too restrictive mainly for the capacitive instruments	This MPE are not applicable for capacitive instruments We wonder what was the basis to consider that they could be appropriate. The MEPs should be different from technologies: capacitive technologies need different MPE.	No change at this stage of the Recommendation per directives.
FR		R59- Part 2	tech	Implement different tests in taking account the technology of the instrument		No change at this stage of the Recommendation per directives.
FR	9	R59- Part 2 A.1.1	tech	The sub clause does not indicate if the accuracy test is performed over the complete range of moisture		No change at this stage of the Recommendation per directives.
FR	17	R59- Part 2 A.2.7		We recommend revising the humidity to 85%.	90% seems too severe	No change at this stage of the Recommendation per directives.
UK		R59- Part 1, 5.18.4.1 , 5.18.4.2 , etc	Edit.	The left indent needs to be bigger to accommodate the longer clause numbers. For example the following clauses look untidy: 5.18.4.1 Calibration version 5.18.4.2 Calibration protection 5.18.4.3 Calibration transfer 5.18.6.1 Prevention misuse	Increase the left indent by an additional 5 centimetres to accommodate longer numbers.	Changes may be made before final publishing

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UK		R59-Part 1, 1.3, 5.5, 5.18.1, A.4.1, etc.	Edit.	The text “instruments/measuring systems”, “instruments”, and “measuring instruments” are used inconsistently throughout the document.	Suggest harmonising to “measuring instruments”. And adopt the terminology from the VIML [OIML V2-200:2012, 3.1] “device used for making measurements, alone or in conjunction with one or more supplementary devices”	Where appropriate changes may be made prior to final publishing.
UK		R59-Part 1 2.1.9, 2.2.1, 2.2.2, 2.2.3, etc	Edit.	The references are not linked to the bibliography. [OIML D11, 3.9], [OIML D 31, 3.1.2], [VIM 4.9], etc.	Link references to bibliography, e.g., [OIML D 31, 3.1.2][4], [VIM 4.9][25], [OIML D11, 3.9][3], etc. Suggest creating a bibliography for VIML: [25] International vocabulary of legal metrology (VIML) OIML V 1:2013	Where appropriate changes may be made prior to final publishing
UK	9	R59-Part 2 A.1.1, A.1.4, A.2.2, A.2.6.1, A.2.8, etc.	Edit.	Error in last sentences of 2 nd paragraph: “R 59R 59-1”,	Delete one of the “R 59”	Accepted
UK		R59-Part 2 A.4, etc	Edit.	The references are not linked to the bibliography. 1 st paragraph “...and OIML D 11”	Link to bibliography, e.g., OIML D11[3].	Appropriate changes may be made prior to final publishing
UK	43	R59-Part 3 B.13.13	Edit.	Clause numbering is not correct “B.13.13” Title is not aligned correctly.	Check clause numbering should be “13.13” Insert space to move table beneath title.	Accepted
UK	55	R59-Part 3 13.17.2		Test report table may not be correct.	Check table format for correctness.	Tables will need to be edited prior to final publication
Sweden				This instrument category is not in the scope of legal metrology in Sweden. We do not have enough information to vote in this matter.		

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Austria	From page 38	ANNE X A – Test procedures	Gen	A “Sand” and Dust test is not included in the CD 7. Austria is strongly interested in having a dust test in the test procedures, because when Moisture meters are used, the grain produces a lot of dust. When the grain is taken over from the farmer and measured, most of the grain samples are not really cleaned (too little time). When during the day hundreds of measurements are taken, this will pollute the room and the measuring instruments. Therefore we suggest including a Dust test procedure during the type approval.	It is strongly recommended to include Dust tests according to OSHA limits. When the grain (directly coming from the field) is filled in the Moisture meters it is producing dust. When during the day hundreds of measurements are undertaken, this will pollute the room and the measuring instruments. Especially new instruments, using optical and/or infrared technique, can be influenced by dust, e.g. optical sensor, IR Sensor, IR Detector. Therefore we suggest including a Dust test procedure.	Previously discussed and noted that this test is too severe and that moisture meters are not subjected to this type of environment.

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AU			General	Australia is voting 'NO'.	<ol style="list-style-type: none"> 1. The Recommendation has been progressed to the DR stage without addressing any of Australia's concerns raised for 7 CD and as such our concerns still remain. 2. The Recommendation does not use the test procedures outlined in OIML D 11 (General Requirements for Measuring Instruments) and make reference to national test standards such as NTEP. As such the test methods are incomplete and would not assist international pattern approval laboratories (e.g. Australia) to adhere to the test procedures outlined in the document. 3. Test procedures appear to be very incoherent. E.g. discrepancy between the test methods and the test reports outlined in the document may lead to ambiguity regarding the test. 	<p>See some clarifications added to test procedures.</p> <p>Some formatting issues in test reports that will need to be edited prior to final publication.</p>

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AU			General	Australia is voting 'NO'.	4. Australia proposes to harmonise the 7CD OIML R59 document with 5CD Rxxx "Protein Measuring Instruments for Cereal Grains and Oilseeds" (Aug 2014) which was seeking to progress to a draft recommendation. Most of the moisture measuring instruments measure both moisture and protein. As such, test for these instruments should be harmonized. But the document 7CD OIML R59, as it exists now does not harmonise or complement the Protein document	See some clarifications added to test procedures. Some formatting issues in test reports that will need to be edited prior to final publication.
AU	15	Audit Trail Annex C C.1.3	Edit	We suggest removing this extra definition for 'Audit Trail'.	Remove repetition – 7 CD R59 3.2.1 already contains this definition.	Accepted Removed definition of Audit Trail in current section R 59 Part 1 Annex A Section A.1.3

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AU	22	Rated Operating Conditions 5.2 (b)	Gen	We recommend revising ‘Rated Operating Conditions – Relative Humidity’ to ‘Rated Operating Conditions – Maximum relative humidity (at maximum ambient temperature): 85% RH.	To reduce ambiguity in the understanding and interpretation of RH and absolute humidity . The absolute humidity at 85% RH and TH, (e.g. 30 – 50 °C) already exceeds that at 90% RH and reference laboratory temperature (e.g. 20 – 27 °C).	The reference conditions are those maintained in the laboratory for testing in the laboratory. Humidity and temperature must be maintained to ensure a fair test. Especially when testing with grain samples which can easily absorb or lose moisture during testing in the laboratory. The rated operating conditions are conditions that the manufacturer state the instrument will operate and testing is performed in an environmental chamber.
AU	23	Reference Method 5.3	Tech	To facilitate Reference Method Traceability, we recommend adding: “Systematic errors in the execution of the reference method may be reduced by having traceability to the results of a collaborative survey of several reference method laboratories. “, as a note.	It has been previously noted that slightly different measurements can be obtained using the ISO oven method – particularly for corn. It will harmonise the Reference method traceability requirements with TC17/SC8/p1 5CD B.1.1.	No change at this stage of the Recommendation per directives.

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AU	28	Moisture Range 6.11.1	Tech	We suggest harmonisation with TC17/SC8/p1 5CD 5.1.1 and 5.1.2 for the checking facility requirements between the two documents. We seek clarification with regards to Secretariat's response on the instances where an out of range moisture reading is required.	7CD R 59 is allowing for moisture content measurements that are outside the type approved range, provided the displayed result is accompanied by an error message. Yet an error message and no moisture content results shall be displayed if the approved ranges for ambient temperature or sample temperature or sample and instrument ΔT are exceeded. In comparison, TC17/SC8/p1 5CD 5.1 requires an error message, unambiguous warning OR a blank display if any of the operating ranges or the measuring range is exceeded. However, "further measurements shall be automatically prevented" in the event of a fault, or if influence factor/ sample characteristics remain outside type-approved ranges.	In type approval all moisture ranges or grains are not tested. So an error message accompanies any moisture measurement outside the tested moisture range as evidence that the moisture reading could be in error. All measurements may be affected if approved ranges for temperatures are exceeded.
AU	35	Practical Instructions 7.1	Tech	We seek clarification on the Secretariat's response to comment 116 on TC17/SC1 OIML R59 6CD regarding the proposed revision suggested for #Moisture content. "The moisture level must not make the sample susceptible to mould, which can occur at relatively low levels for certain types of grain, e.g. over 13% moisture for wheat", not incorporated in the text.	Harmonisation with TC17/SC8/p1 5CD B.2.1 – 2.2 where possible.	We harmonized the first paragraph in practical instructions. Not clear from your comment if you are suggesting that the sentence in quotes be added.
AU	35	Sample Handling and Storage 7.3	Tech	We recommend the addition of "Except during analysis time, a test sample shall be returned to its enclosure".	Some of the tests prescribed here are quite lengthy. To leave a sample outside the enclosure for a substantial length of time could compromise the integrity of the sample for other subsequent tests that may be carried out on them at a later date.	Accepted Considered editorial. Added sentence to now R59 Part 2 Section 1.3 Sample Handling and Storage

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AU	47	Instrument Power Supply A.2.4.1	Tech	We seek clarification on the requirement: “After each change in voltage, allow the meter to stabilise for 30 minutes before testing”.	The test procedure as described in OIML D11:2011 suggests that, the EUT needs to be exposed to a specified power supply condition for a period sufficient for achieving temperature stability and required measurements can then be subsequently performed.	Accepted Considered editorial. Corrected sentence to match OIML D11
AU	48	Basic Instrument Tests A.2.7	Tech	We propose that the humidity test be based on the OIML D 11 endorsed, Damp Heat (no condensation) test, i.e. IEC 60068-2-78 and IEC 60068-3-4.	We would like to revisit the decision about applying OIML D 11 endorsed test standards made in the Sep 2010 meeting. We note that the current test parameters are very hard to achieve as details regarding the test procedure is incomplete. This would make it very hard for us to carry out the testing on EUT. Harmonisation with TC17/SC8/p1 5 CD C.5.4.	Decision was to keep the existing test procedure.
JP		2.4 and others	Edit.	Delete definitions of Δt_{\max} , $\Delta t_{C, \max}$, $\Delta t_{H, \max}$, $\Delta t_{C, \text{sample}}$ and $\Delta t_{H, \text{sample}}$. Delete one of the definitions of RH. Add definitions of d , F_{nom} , i , j , m , n , r , RH_{ref} , U_{nom} , V_{nom} , x and y .	Some definitions of acronyms and parameters, which are not used in this draft, still remain. On the contrary, the definitions, which are used in this draft, do not exist in this clause. Definition of RH is redundant.	Accepted Deleted unnecessary definitions other definitions are defined within the text.
JP		2.3.11 moisture content ...	Edit.	The title should be modified.	Insert comma or a preposition between “moisture content” and “wet-basis”; or change the title to “wet-basis moisture content”.	Accepted
JP		2.4 Abbreviations... SD	Edit.	Modify the definition of SD by adding a reference.	Add the reference “[See R59-2, A.1.3]” in the end of the definition of SD.	Accepted
JP		2.4 Abbreviations... SDD	Edit.	Modify the reference of SDD.	Add “R59-2,” as shown below. Present: A.1.2 Suggested: [See R59-2, A.1.2]	Accepted

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JP		2.4 Abbreviations... STS	Edit.	Modify the reference of STS.	Add “R59-2,” as shown below. Present: A.3 Suggested: [See R59-2, A.3]	Accepted
JP		2.4 Abbreviations .. . Δt	Edit.	Correct the definition of Δt .	Delete “T” of “ Tt_{ref} ”. Present: Tt_{ref} Correct: t_{ref}	Accepted
JP		2.4 Abbreviations .. . y(bar)	Edit.	Correct the reference of y (bar).	Please make a correction as shown below. Present: (see 8.3.1 and B.13.10) Correct: (see R59-2, 2.3.1 and R59-3, B.13.11)	Accepted
JP		2.5 Additional symbols ...	Edit.	Correct the reference	Please make a correction as shown below. Present: Annex A Correct: R59-2, Annex A	Accepted
JP		4.1.2 Rated operating condition	Edit.	Please make corrections.	Modify the expressions using superscripts. Present: “25 / 30(1) cycles,” “250 / 300(1) cycles”, “0.15 MHz – 80(2) MHz” Correct: “25 / 30 ⁽¹⁾ cycles,” “250 / 300 ⁽¹⁾ cycles”, “0.15 MHz – 80 ⁽²⁾ MHz” In addition, modify the expressions as shown below. Present: “Note 1” and “Note 2”. Correct: “ ⁽¹⁾ ” and “ ⁽²⁾ ”	Accepted

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JP		4.2 Rated operatin g conditio n	Tech.	<p>The expression of the first sentence should be corrected as shown below (underlined).</p> <p><i>Measuring instruments do not exceed the MPEs for <u>type evaluation</u> as defined in <u>4.4.1</u> when</i></p>	<p>It is generally considered that rated operating conditions are defined for type evaluation, and MPEs for type evaluation and initial verification are the same. Therefore, the MPEs for type evaluation (4.4.1) should be referred in the first sentence.</p>	<p>No change at this stage of the Recommendation per directives.</p>

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JP		4.4, 4.4.1 and 4.4.2 (MPEs) A.1.1 (part 2)	Edit./Tech.	<p>The correct scheme (step wise or linear) for defining MPEs shall be explained clearly.</p> <p>The example in 4.4 should be amended using a higher interval than 16 %.</p> <p>The expressions in A.1.1 may be amended if necessary.</p>	<p>It is difficult to understand the first long sentence in 4.4. Our understanding of this sentence is that the maximum and constant value of MPE shall be applied within an interval of 2 % moisture content (<i>M</i>). It means for example that only one MPE of 0.45 % would be applied to the interval from <i>M</i>=16 % to 18 % (in type evaluation with corn). However, the tables in 4.4.1 and 4.4.2 specify that the MPE increases linearly with <i>M</i> in the range <i>M</i> > 16 %. Thus, there is a discrepancy between the expression in 4.4 and that in 4.4.1 (or 4.4.2). In other words, it is not clear if MPE increases step wisely or lineally?</p> <p>The last sentence in 4.4 in the parenthesis provides an example for an interval from 10 % to 12%. However, it is better to use a higher interval than 16 % in order to provide a better explanation where MPE increases with <i>M</i>.</p> <p>We note that similar expressions are also seen in A.1.1 (part 2). This clause may also be amended in compliance with above comment and change.</p>	See editorial change to match editorial change to R59-2 A.1.1
JP		4.4.1 (table for MPEs)	Edit./Tech.	<p>The examples of MPEs in the parentheses should be expressed as shown below for “corn etc.” and “all other grains”, respectively.</p> <p>If $M < 16$ then MPEs = 0.4; else MPEs = $0.025 \times M$ If $M < 17.5$ then MPEs = 0.35; else MPEs = $0.02 \times M$</p>	Regarding expressions of MPE in the column (2), we prefer the expression in the parenthesis “(e.g. if).”. It is easier to understand.	No change at this stage of the Recommendation per directives.

Country code	Page	Clause	Gen/Tech/ Edit	Comment	Reason for comment	Response
JP		4.4.2 (table for MPEs at verification)	Edit./Tech.	MPEs should be expressed as shown below for “corn etc.” and “all other grains”, respectively. If $M < 16$ then MPEs = 0.8; else MPEs = $0.05 \times M$ If $M < 17.5$ then MPEs = 0.7; else MPEs = $0.04 \times M$	Regarding expressions of MPE in the second column, we prefer the expression shown on the left.	No change at this stage of the Recommendation per directives.
JP		4.4.2 (table for MPEs at verification)	Edit.	There are two commas.	Delete a redundant comma after “pulses” as shown below. Present: (I) Corn, oats, pulses, ,rice, sorghum, sunflower Correct: (I) Corn, oats, pulses, rice, sorghum, sunflower	Accepted
JP		4.5 Accuracy and precision ...	Edit.	It seems the title and the content do not match.	The content is more like a “definition” rather than “requirement”. It is better to modify the contents into a form of requirement.	It provides information on how accuracy is determined.
JP		5.1 Grains and minimum moisture ranges	Edit.	In the last sentence, the reference seems wrong.	Delete “specified in 4.1.1” and add “of moisture content” as shown below. Present: ... subject to the minimum ranges specified in 4.1.1. Correct: ... subject to the minimum ranges of moisture content	Accepted Changed reference
JP		5.10.3 Marking...	Edit./Tech.	Our understanding is that “operator” indicates a person who is responsible for maintenance or calibration of the meter and is different from a conventional utilizer. If this understanding is correct, an amendment shown below is recommended. <i>However, keys necessary only to the maintenance/calibration operator shall be marked to the extent that a trained operator can understand the function of each key.</i>	The second sentence has been revised significantly in DR. However, its practical meaning is still not clear. The meaning of this sentence even seems to contradict that of the first sentence which requires a clear identification on the keys.	No change at this stage of the Recommendation per directives.

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JP		5.12 Provisio n...	Edit.	The reference is wrong.	Correct “Annex C” to “Annex A”.	Accepted Changed to R59-1, Annex A
CH					CH abstains as these instruments are not under legal metrology control in Switzerland	