

1. What do you see as the advantages and disadvantages of EU action on the free movement of goods? How might the national interest be served by action being taken in this field at a different level (for example, at the WTO), either in addition to or as an alternative to EU action?

It would be the view of the UKWF that the EU single market for goods operates well and has done so for many years. The notion of a single technical standard for to harmonization of weighing instruments across the single market is beneficial to ensuring the ease with which products can be manufactured and supplied across all member states. The EU standards mirror the International standards produced by the OIML and the process of attempting to harmonize standards has taken place at both the EU and the International level for many years. There would be little benefit to UK businesses to change the present situation as it may well exclude us from existing and well operating procedures.

2. To what extent do you think EU action on the free movement of goods helps UK businesses?

This is difficult to answer meaningfully as you are asking to compare the benefit of the operation of single market and the free movement of goods against the effect of not having easy access to the single market and the consequent reduction in the easy movement of goods

The weighing industry has worked with a harmonized EU standard for 23 years and has developed a strong market sector that works well in co-operation with the member states and the Commission. One can speculate that the removal of the free movement of goods would provide ample opportunity for certain member states to create technical barriers to trade, using very technical requirements implicit in most weighing and measuring equipment to favour internal industries

3. To what extent has EU action on the free movement of goods brought additional costs and /or benefits to you when trading with countries inside and outside the EU? To what extent has EU action on the free movement of goods brought additional costs and /or benefits to you as a consumer of goods?

It is assumed that converse of a single harmonised standard across all member states would be different national requirements in each member state and the increased cost that this would bring in designing and manufacturing to different standards

I would suggest that the probable outcome would be one harmonised standard across member states which UK industry would manufacture to. (I would not envisage specifically UK products being manufactured for the UK market).

This would lead to UK manufacturers having to make to standards and technical requirements over which they has no say.

An example of the effect of not having free movement of goods is the USA that uses different weights and measures standards to those used in the 28 member states. It is the view of the UKWF that they are examples when the technical specifications have been used to exclude EU and UK businesses on technical grounds. It is assumed that similar costs would be incurred if the action of the free movement of goods were diminished in the EU

4. What types of EU action would be helpful or unhelpful for your activities as a business and/or as a consumer in the Internal Market?

The weighing and measuring sectors already has a framework where EU matters are discussed (WELMEC) and its own EU Trade Association (CECIP) that is an active participant in all of the appropriate meeting

If there were a change that needs to be made it would be an increase in the volume of meaningful market surveillance to ensure that the single market operated correctly with all economic operators competing fairly.

At the moment the procedure for creating legal requirements is fair and reasonable, but the requirements are not enforced properly and this has a detrimental effect on legitimate businesses

5. To what extent do you think the harmonisation of national laws through EU legislation (as opposed to international treaties) is helpful or unhelpful to your activities as a business and/or as a consumer in the Internal Market? In your experience do Member States take a consistent approach to implementing and enforcing EU rules? Please give examples.

The harmonization of laws in the EU is very helpful. It is a technical field and it would be the view of the UKWF that the existing frameworks operate reasonably well. International treaties would probably end up being a cumbersome approach with many different treaties with different nuances depending on the requirements of each national authority.

There seems little to be gained on re-writing and re-negotiating existing frameworks with which the industry is reasonably content

There is a difference in national approaches to the implementation of EU standards with some member states being more prescriptive than others. It is the view of the UKWF that the UK Government has a very reasonable and pragmatic approach to the implementation of legislation. The concern of the UKWF is that the UK manufacturers would inevitably need to manufacture to the EU standards regardless of the UK position in Europe. The concern however is that without the UK's "counterbalance" to some other member states we would end up having to build to the more strict interpretations of other member states without an ability to temper the view to the more pragmatic and sensible UK interpretations

.6. Do you think that the EU strikes the right balance between regulating imports and exports and facilitating international trade?

Yes

7. Do you think the UK's ability to effectively regulate cross-border movements of goods would be better, worse or broadly the same as the result of more or less EU action? Please provide evidence or examples to illustrate your point.

The ability to effectively regulate cross border movement of goods is dependent on sufficient competent inspectors. This in turn is dependent upon the appropriate finances to employ such inspectors. It is the view of the UKWF that this is largely independent of EU action and is a question of law enforcement. It appears unlikely that there will an increase in the resources for cross border regulation of goods in the medium term, so it is the view that EU action will have little bearing on this

An example- The safety regulation applying to furniture are national law, the regulations applying to EU law are European, The question is not the source of the regulation but the resources to enforce it