



## Weights and Measures Bulletin No. 1007 – July 2019

### Installation of Factory Conformity Assessed MID<sup>1</sup> Dispensers

The Office for Product Safety and Standards (OPSS) has considered the question of whether a factory conformity assessed<sup>2</sup> fuel dispenser system (under module D<sup>3</sup> of the MID) requires re-verification when it is installed on a retail site and connected to an EPoS<sup>4</sup> device (with the stored transaction facility activated).

It should be noted that it is assumed that the EPoS device should of course be legally approved to be able to be connected to the dispenser by virtue of the TEC<sup>5</sup> (supplements, variants etc), i.e. the system should be type approved and the dispenser and the EPoS device are both included in the Declaration of Conformity (DoC). The 'measuring system' must be initially verified as a total entity otherwise it is liable to disqualification if an enforcement authority deems the adjustment, alteration or addition is likely to affect its compliance with the essential requirements of the MID.

The in-situ table found in Section 1.4 (On-site verification) of WELMEC Guide 10.8<sup>6</sup> lists a fuel dispenser with an SSD<sup>7</sup> (which includes an EPOS device) as having a high probability that examination and certification on the site of use will be necessary.

There are three potential scenarios for Module D conformity assessment:

1. The full conformity assessment is carried out at the factory including testing and evaluation of the connection of the EPoS device to the fuel dispenser, considering the communication protocol necessary for appropriate functioning of the system and that the communication protocol works in practice. To provide a high degree of assurance it is recommended that the manufacturer or someone on behalf of the manufacturer carries out reasonable checks to ensure the measuring system is functioning correctly on site. Ultimately it is the manufacturer that must issue the Declaration of Conformity for the complete system.
2. The conformity assessment at the factory is limited to the functioning of the fuel dispenser and the manufacturer completes the conformity assessment process on site (refer to WM1003 for appropriate accuracy and function tests).

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<sup>1</sup> Measuring Instruments Directive 2014/32/EU

<sup>2</sup> European term for initial verification

<sup>3</sup> Conformity to type based on quality assurance of the production process

<sup>4</sup> Electronic Point of Sale

<sup>5</sup> Type Evaluation Certificate

<sup>6</sup> European Legal Metrology Guide for common application of MID MI-005

<sup>7</sup> Self Service Device (Defined in MID Annex VII (M-005))

3. The whole conformity assessment process as outlined in point 1 is carried out on site.

If a new fuel dispenser and a new EPoS device have been conformity assessed under a module D process in the factory then there is no need to re-verify (re-qualify<sup>8</sup>) on site.

It should be noted that the Module D conformity assessment process carried out by the manufacturer on site could equally well be carried out by a Module F<sup>10</sup> Notified Body.

If the new factory conformity assessed fuel dispenser is connected to an existing EPoS device then this is an alteration to an existing measuring system and WM 1003<sup>9</sup> applies.

OPSS also considers that:

- If the factory conformity assessed fuel dispenser is a like for like replacement then there would be no need to re-verify, reasonable due diligence checks carried out by the fitter should be sufficient. In the event the system is found to be non-compliant by an enforcement authority it is liable to disqualification.
- If the factory conformity assessed fuel dispenser is of a different type then re-verification (functional check of SSD, not accuracy tests) would be required using testing methods as described in WM1003 for change of EPoS device.

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<sup>8</sup> Re-verify and re-qualify have the same meaning

<sup>9</sup> WM1003 is a weights and measures bulletin guidance on when and when a re-verification should be carried out on existing fuel retail sites

<sup>10</sup> Conformity to type based on product verification  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/551147/WM\\_1003\\_actions\\_to\\_be\\_taken\\_when\\_weighing\\_and\\_measuring\\_instruments\\_are\\_repaired\\_adjusted\\_altered\\_or\\_added\\_to.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551147/WM_1003_actions_to_be_taken_when_weighing_and_measuring_instruments_are_repaired_adjusted_altered_or_added_to.pdf)