

Document associated to paper 36/31

General

A national operation of surveillance was conducted in France in Autumn of 2013 which was focused on NAWI connected to POS devices.

More than 8500 NAWIs were controlled, located on around 2700 sites.

A lot of non conformities were found.

About 30 % of the instruments were found as non compliant.

More than 17 % of the instruments were non conform to the requirements concerning connection between the weighing instrument and POS device:

- procedure for putting into service not fulfilled
- POS or associated software not certified
- problems related to display or printing of weighing results

For more than 14 % of the instruments, it was possible to record or to print twice (or more) the same transaction without modification of the weight on the load receptor which was obviously a serious risk of accidental misuse or of fraudulent use.

3,3 % of the instruments were non compliant on that basis alone.

Particular issues

1. Declaration of conformity

The following type of Declaration of Conformity was found for a combination NAWI+POS.

Company		Declaración de conformidad Déclaration de conformité Declaration of conformity	
Adress			
Declaramos bajo nuestra responsabilidad que la combinación de uno de los siguientes IPFNA Nous déclarons sous notre seule responsabilité que la combinaison IPFNA We declare under our own responsibility that the combination of one of the following NAWI			
Modelo Type Type	1852ba10		
con el Terminal Punto de Venta avec le TPV with the PoS			
Fabricante / Fabricant / Manufacturer	Modelo / Type / Type	Certificado de Ensayos / Certificat d'essai / Test Certificate	
A	Az1	Dzsd09	
A	Z2	Dsds10	
B	Cd10	Sds12	

Se corresponde con el modelo descrito en el certificado de Aprobación CE de Modelo xxx
Correspond au modèle décrit dans le certificat d'approbation CE de type xxx
Corresponds to the model described in the EC Type Approval Certificate xxx

y es conforme a las exigencias de las Directivas del Consejo 2009/23/CE, 2006/95/CE y 2004/108/CE.
et est conforme aux exigences des Directives du Conseil 2009/23/CE, 2006/95/CE et 2004/108/CE.
and is in accordance with the requirements of the Council Directives 2009/23/EC, 2006/95/EC and 2004/108/EC.

Signature
Signature
Firma

Date
Date
Fecha

This document doesn't provide information on what instrument has actually been placed on the market.

In the scope of modular approach, paragraph 2.2 of Welmec guide 2.2 specifies that this approach can be applied provided that a document is filled in that shows combination NAWI+POS during EC verification or EC declaration of conformity.

It is therefore at least necessary that the POS device that has been actually put into service is identified (e.g by ticking the corresponding box or by striking out the other POS devices).

2. Recording/printing twice the same transaction

Different cases related to printing twice the same transaction were found.

In several cases, it was directly possible to print twice the same transaction.

The main causes were:

- either defects in the POS software
- or defects due to the use of different communication protocols than these that were examined during validation of design of the POS devices.

In another case, things were more complicated and needed to be developed through the description of the operating procedure as follows.

- step 1 : 2 kg of an article "A" are put on the load receptor
- step 2 : cashier takes action to get price calculation with 1€ / kg
- step 3 : transaction recorded for a price to pay of 2€ for this article "A"
- step 4 : without doing anything for the load on the load receptor, cashier takes action to get the same transaction
- step 5 : the process gets blocked

Intermediate conclusion : the instrument is in conformity to the requirements

- step 6 : article "A" is taken off the load receptor
- step 7 : a non weighed article "B" is passed through the scanner
- step 8 : transaction related to article "B" is correctly recorded
- step 9 : 3 kg of an article "C" are put on the load receptor
- step 10 : an immediate automatic registration takes place (even if cashier takes any action to get another price calculation) ; this registration is related to the weight on the load receptor, i.e 3 kg but with article "A" and the corresponding price per kg!

Conclusion : in this example, the automatic registration with undesirable data (i.e price per kg) makes possible to misuse unintentionally the instrument and this may even lead to fraudulent use.

(Essential requirement 8.5 of the Directive 2009/23/EC specifies that "*the instrument shall have no characteristics likely to facilitate fraudulent use whereas possibilities for unintentional misuse shall be minimal* ")

3. Stakeholders in the process of an installation of a NAWI+POS

It was noted that some installers perform part of operations without being included in the scope of the approved quality system of the manufacturer who has made the declaration of conformity under the surveillance of the N.B.

4. Changes to non legal part of software that impact legal part

A configuration was found where there was no operator, a video was developed to explain operation of the system to consumers.

On the display, the video has masked the area displaying the unit of measurement.

Sometimes, this kind of change is realized by a software specialist employed by the retailer.

5. Communication protocols between NAWI and POS

A lot of non conformities occurred because of unexpected effects of communication protocols that have not been dealt with.

A NAWI + POS could print two times the same data. The problem had not been identified by the manufacturer of the weighing instrument (NAWI giving weight alone); a POS + software was connected using a price calculated protocol. To achieve compliance, it was necessary to modify the protocols of instruments installed.

If the conformity depends on configuration adapted in situ, this means that there should be a second stage of EC declaration of conformity or EC verification after the final setting has been made.

6. Checksum

Cases were observed where it was possible to display different values of checksums according to the code entered by the operator.

After having typed a code to get the value of checksum, together with designation of the NAWI, designation of POS and designation of software, the displayed data were not corresponding to the installed instrument..

The user explained that installation had been modified 2 years before and since there, another code was to be typed in to get information corresponding to modified installation. So, 2 sets of data were available.

The ongoing revision of Welmec guide 2.2 (item WG2-21 of the working program) should :

- include discussions to take into account some of these particular issues.
- reconsider some existing points of the guide, e.g the note of paragraph 2.1 dealing with communication protocol ; the checklist of annex 7 where it is written "*not mandatory*" associated to checking the "*impossibility to print the same transaction twice...*".

COMMUNICATION

- The findings and conclusion of this operation was presented to the federation of supermarkets and to the national branch of CECIP (COFIP).
- Manufacturers of POS, software and/or NAWIs were contacted individually
- The regional directions now survey that all situations are corrected