



WEIGHTS & MEASURES ACT 1985

SECTION 70 RETURNS

ANNUAL REPORT 2010/11

Summary

Local Weights and Measures Authorities (LWMAs) have a statutory requirement (under section 70 of the Weights and Measures Act 1985) to report to the Secretary of State the level of local weights and measures enforcement work conducted over a twelve month period. The information is used as evidence to inform and update the National Measurement Office's (NMO's) risk matrix in relation to instruments, pre-packages and transactions. This analysis of data is intended to help local authorities focus their resources to where it matters thus helping to plan a targeted risk-based delivery avoiding unnecessary routine interventions.

This year 97% of authorities submitted a return to the NMO who collate and report the information on behalf of the Secretary of State.

The data analysis for section 70 returns for 2010/11 shows that the three categories with the highest potential for failure are;

- Weighbridges and scales ≥ 5 tonnes
- Non-automatic weighing instruments >30 kilograms but <5 tonnes
- Non-automatic weighing instruments ≤ 30 kilograms

The NMO Risk Matrix 2011 was adjusted accordingly, all instruments stayed in the same category.

- Importers of packaged goods have been moved back to a higher red risk category from the amber category they were downgraded to in the last report. In the Risk Matrix 2010 they were 'possible failure' and 'high impact' and now they are 'likely to fail' and 'high impact'. This is due to the increase in the percentage of non compliance and the WELMEC Importers project that found authorities may be unaware of a large number of importers.
- In light of the recent project findings on the compliance of Length Measures they have been moved from 'very unlikely' and 'low impact' to 'possible' and 'low impact.'
- Scrap metal dealers have been added to the Risk Matrix owing to the emergence of legal prosecutions against cases of non-compliance. They have been listed as 'possible' and 'high impact'.
- Weights have been moved from 'very unlikely' to 'unlikely' and remaining as 'high impact' due to the 20% increase in the number found incorrect and the obliteration of stamp. This however only accounts for 0.88% of the number of weights inspected.



Such was the climate of austerity last year the spending cuts have greatly affected local authorities. Financial constraints, service restructuring and staff redundancies as such have been widespread throughout authorities.

Weights and measures enforcement services continue to compete for resourcing with other areas such as animal health and welfare, food standards, agriculture, counterfeit goods and underage sales. The less capacity to carry out proactive checks on goods and service sold by weight or measure will inevitably leave consumers increasingly vulnerable. Given that the 2009 Deloitte report of the Economics of Weights and Measures Legislation found the size of the market for goods traded by reference to measurement is some £212 billion there is a great value of detriment to consumers and businesses.



The NMO intends to promote keeping metrology on authorities' agendas by supporting project based and authority regional co-operation working plus identification of regional and national trends. Projects are conducted on different scales, implemented by individual authorities, regional metrology groups or on a national level. The NMO encourage authorities to take part in these projects but also to submit the write up and results of authority or regional wide projects (send to metrologyupdates@nmo.gov.uk).

This information allows the NMO to build a realistic picture of metrology work and results in more detail than can be ascertained from the results of this report. It highlights the trends in weights and measures, it encourages the NMO to be proactive and allows evidence based policy making.

Recommendations

1. To maintain the risk based approach to weights and measures inspections, NMO will promote the findings of the section 70 report, the risk matrix and these recommendations to all local authorities.
2. To promote a reduction in the rate of non compliance resulting in improved consumer protection and fair competition in the future.
3. To encourage LWMA's to take part in authority, regional and national metrology projects and to submit the results to the NMO.

Introduction

This report is a collation of the activities reported to the National Measurement Office (NMO) by Local Weights and Measures Authorities (LWMAs) throughout Great Britain under section 70 of the Weights and Measures Act 1985 for the year April 1st 2010 to March 31st 2011.

Section 70 of the Weights and Measures Act 1985 states;

“Annual reports by local weights and measures authorities

(1) Each local weights and measures authority shall, in respect of each financial year of the authority, make to the Secretary of State by such date as he may direct a report on the operation during that year of the arrangements made to give effect in that authority's area--(a) to the purposes of this Act, and

(b) to functions relating to weights and measures which are conferred on the authority otherwise than by or under this Act and which are specified, in a notice in writing given to the authority by the Secretary of State and not withdrawn, as functions to which this paragraph applies.

(2) Any report under subsection (1) above shall be in such form and contain such particulars of such matters as the Secretary of State may direct.

(3) Any report made to the Secretary of State under this section may be published by the local weights and measures authority by whom it is made.

(4) The Secretary of State may include the whole or any part of, or any information contained in, any such report, whether published or not, in any statement which may be made or published by the Secretary of State with respect to such arrangements as are mentioned in subsection (1) above either generally or in any particular area.”

Therefore, authorities have a statutory duty to report the level of local enforcement work conducted over a twelve month period. This year, 198 out of 204 authorities (97%) returned the report to the NMO. This result is a 2% improvement from last year when 95% of authorities sent returns. Many of the returns were only submitted after a series of reminder emails and follow up calls were issued from the NMO. Out of the six authorities who did not send a return three were going through staff changes resulting in a severe shortage of Inspectors of Weights and Measures. One authority admitted the low priority of weights and measures meant historically returns had never been completed. Although this is unfortunate it is not unexpected due to the financial strain many local authorities have been under in the last year. The NMO uses the data returned by authorities to;

- Indicate the risk level of weights and measures equipment and transactions in goods
- Target future co-ordinated projects of regional and national concern
- Implement evidence based policymaking

The Process

Method of collecting data:

Local authorities are asked to supply information using a form made available on the NMO website, which when they have completed is sent to a specific section 70 email address as an attachment. The data collection form specified in section 70(2) of the Act contains two parts.

Firstly, there is a section relating to measuring compliance of weighing and measuring equipment, in which the following information is requested;

- Number of pieces of equipment in the region
- Number of individual pieces of equipment inspected
- Number of pieces of equipment found incorrect and a 28 day notice issued
- Number of pieces of equipment found incorrect and verification mark removed
- Number of pieces of equipment related to prosecution or cautions

The requested equipment reported on is listed below, for the purpose of this report the shortened title of the equipment is stated in brackets after the equipment;

- Liquid fuel measuring instruments (LFMIs)
- Weighbridges and scales ≥ 5 tonnes (weighbridges)
- Non-automatic weighing instruments ≤ 30 kilograms (NAWIs ≤ 30 kg)
- Non-automatic weighing instruments > 30 kilograms but < 5 tonnes (NAWIs > 30 kg < 5 t)
- Automatic weighing instruments (AWIs)
- Weights
- Length measures
- Intoxicating liquor measuring instruments (ILMIs)
- Other e.g. water/LPG/bulk flow meters

Secondly, there is a section relating to measuring compliance in transaction of goods, in which the following information is requested;

- Number of businesses liable to inspection
- Number of businesses inspected
- Number of businesses compliant

In reference to;

- Packaging plants
- Importers of packaged goods
- Bulk products by weight or volume
- Retail outlets

For the forthcoming 2011/2012 return the NMO will investigate how best to improve the format to incorporate a national overview of UK wide metrological issues. An open statement box or drop down list that enables each authority to state or choose the metrological issues that they feel should be a high priority. For example, are authorities finding growing issues with scrap metal and gold dealers?



Where do they believe is the biggest detriment to consumers? A nationwide trend would inform the NMO to keep the risk matrix up to date and could lead to national co-ordinated projects that investigate the level of detriment incurred.

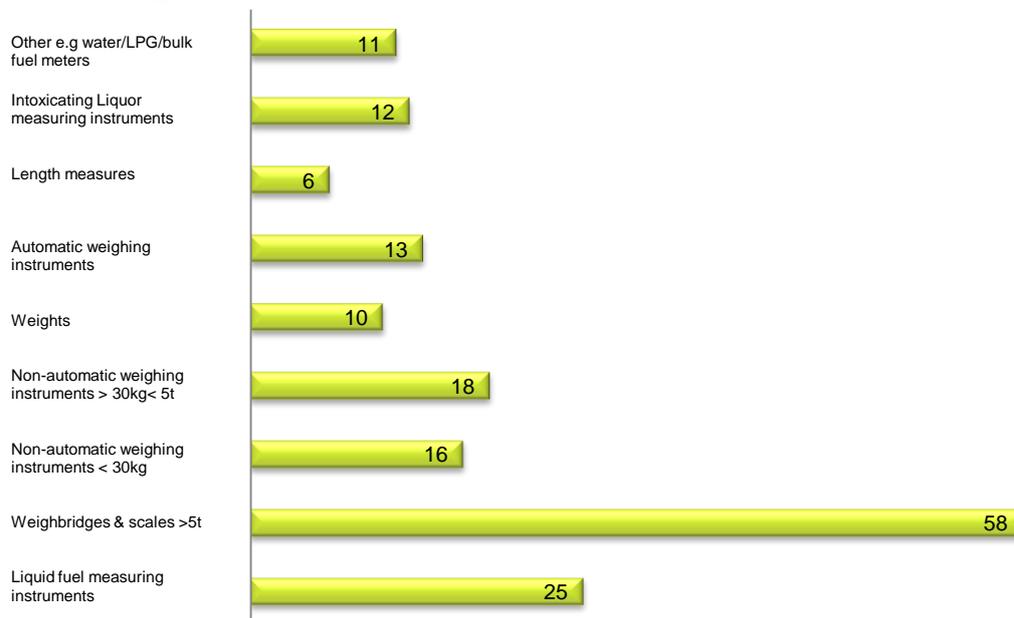
Whilst continuing to fulfil its statutory obligations, the Section 70 return could also focus metrology surveillance on specific types of instrument or transaction each year in which a national picture of compliance levels including an indication of the number and size of inaccuracy is constructed. The results provided by these projects in turn could influence the future content of the Section 70 returns and the risk matrix.

Data analysis

Inspection rate

Inspection rate is the number of individual pieces of equipment inspected by Inspectors of Weights and Measures out of the reported total number of pieces of equipment known to be in the area. For example, in 10/11, 4,288 weighbridges were inspected out of a reported 7,336 pieces of equipment therefore the inspection rate was 58%.

Percentage of inspections on all equipment types



Graph 1: Percentage of inspections on all equipment types

The most inspected type of equipment in 10/11 was weighbridges with 58% of all reported weighbridges being inspected. The second and third most inspected types of equipment are LFMLs and NAWIs >30kg <5t with a 25% and 18% inspection rate respectively. This is consistent with the 09/10 results with a reported 61% of weighbridges inspected which was the highest inspection rate followed by 23% and 28% of NAWIs >30kg <5t and LFMLs being inspected.

The lowest inspection rates for 10/11 were length measures 6% then weights and 'other' (meters, liquefied petroleum gas (LPG), beer measuring instruments and bulk flow meters) with 10% and 11% inspection rate. Length measures were also the least inspected equipment type in 09/10.

Norfolk County Council Linear Measure Project

A 2011 project carried out by Norfolk Trading Standards to check compliance of length measures in accordance with the applicable legislation. From 24 premises visited and 72 linear measures of length tested and examined, 41.6% of all measures were found to be non compliant. Three 28 day enforcement notices were issued to traders to rectify the non compliances, whilst 13 linear measures were removed from trade use through the obliteration of their stamps. Of those 13 measures, 3 had not been stamped as fit for trade purposes and 10 had stamps obliterated due to wear or obscured graduations.

The findings would suggest that there are a larger number of non compliant linear measures in use for trade than estimated. However in the question of customer detriment or short measure there was no evidence to advocate this had occurred.

Dorset County Council Trading Standards Targeted Petrol Inspections Project Report

Between June and the end of August 2010 Dorset County Council performed a project to assess the accuracy of the measurement of fuel. A cross section of the oil companies, supermarkets, small groups and single site operators in the County were visited.

Due to an increase of complaints alleging the delivery of short-measures of fuel that the authority had received and fuel prices at an all time high the aim was to investigate that consumers receive what they pay for.

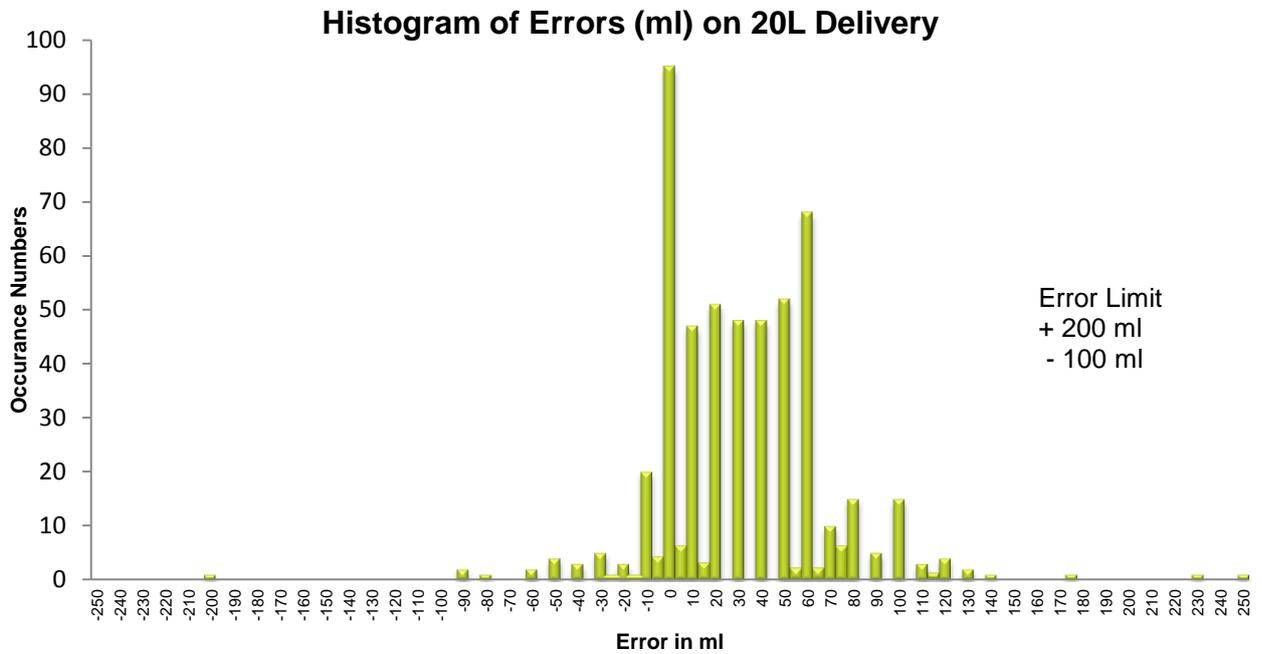
A fast 20 litre measure and a slow 10 litre were taken from each dispenser and the errors were recorded. 37 filling stations were visited across various different types of operator. These were broken down into the following groups: 18 small independents with one or two sites; 5 independent groups which had a number of sites, usually across different counties; 9 oil companies and 5 supermarkets.

534 meters were tested, 523 of which were within the in-service error allowance. The fast 20 litre measures had four outside the error allowance, three of which were in the positive range. The slow 10 litre measures had seven outside the error allowance all excess readings (see histograms on following page). 40% of the meters tested had an error of zero, occurring 212 times.

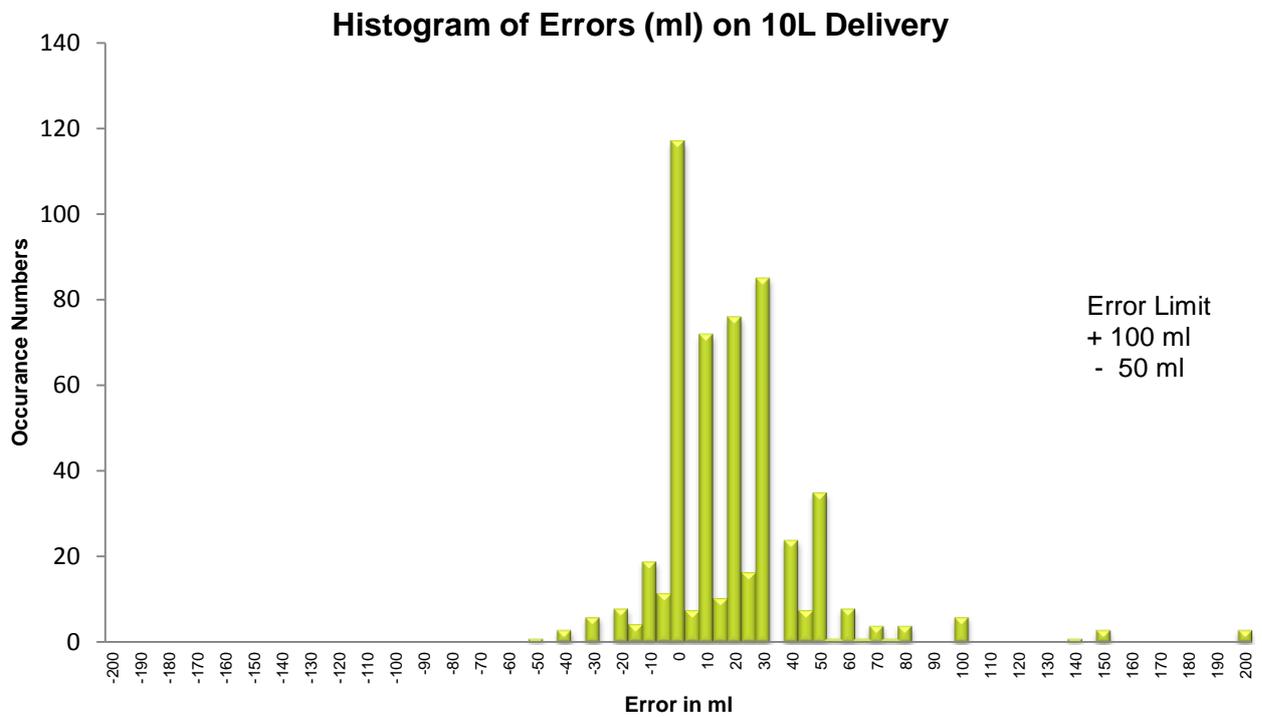
The average error on a fast 20 litre delivery was +31 ml and on a slow 10 litre it was +20 ml.

From the results 90% of the fuel meters that failed an in-service test were in the consumers favour, reading in excess rather than short measure.

The majority of the sites visited did not operate a system where they or a contractor did any regular checks on the accuracy of the meters. None of the independents had arrangements in place for such checks. Of the independent groups only 2 out of 5 did checks, 3 out of 9 of the oil companies did and all of the supermarkets did. There was no significant difference between the accuracy of the deliveries across the different types of operator, although the excess deliveries were found at independents. All sites had a system for monitoring total stocks, as required by their license, but this would not necessarily identify an individual meter dispensing out of tolerance. A number of operators, when asked what checks they made, said that they relied on the local weights and measures authority to make such checks.



Graph 1



Graph 2

Action taken

This section of the report discusses the equipment which has the highest rate of action taken. This covers equipment which was inspected, not correct and further action was necessary either by issuing a 28 day notice, removing the verification mark or being related to prosecution or cautions.

Out of all of the equipment the average further action was;

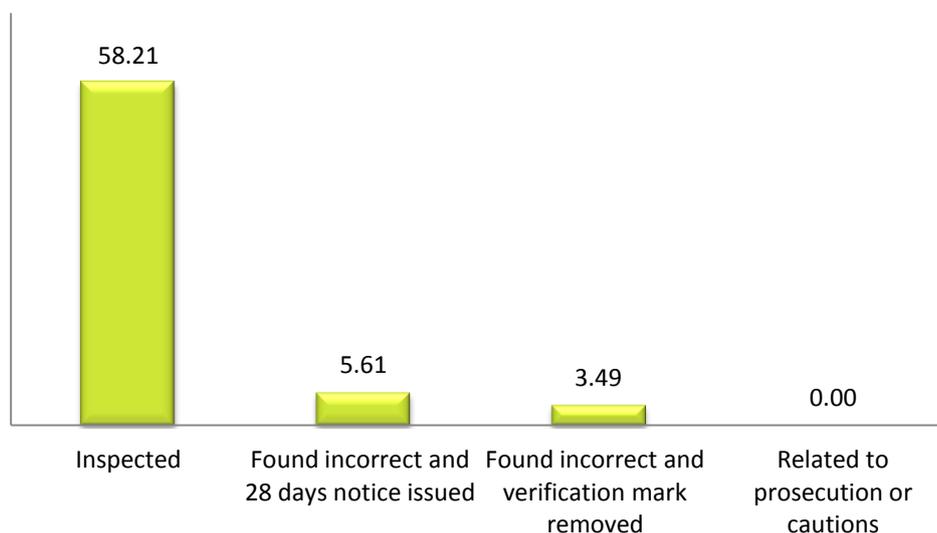
- 1.49% required a 28 day notice
- 1.06% had the verification mark removed
- 0.01% (17 pieces of equipment) were related to prosecution or cautions

The highest action taken figures were all for NAWIs;

1. Weighbridges
2. NAWIs >30kg <5t
3. NAWIs ≤30kg

1. Weighbridges:

Weighbridges and scales ≥ 5t



Graph 3: Action taken for weighbridges

The graph shows that the number of weighbridges found incorrect and issued 28 days notice is over three times higher than the average (for all equipment) and the number found incorrect and the verification mark removed is nearly four times higher although no equipment in the UK was related to prosecution or cautions. Compared to 2009/10 the inspection rate of weighbridges is down by 3.16%, but there is an increase of 0.25% in the number found to be incorrect and issued 28 days notice and 0.63% increase in the number of verification marks removed.

Weighbridge Project (2010-11)

The NMO and LG Regulation (formerly the Local Authorities Coordinators of Regulatory Services, LACORS) ran the first of a two part national weighbridge project that took place over 2010 to 2011.

The project was to confirm and highlight the rate of failure of this type of equipment, showing the importance of weighbridge accuracy and the impact errors can have on the environment, the cost to businesses and local authorities. In particular it was designed to ensure that local authorities have robust information relating to landfill tax and recycling targets.

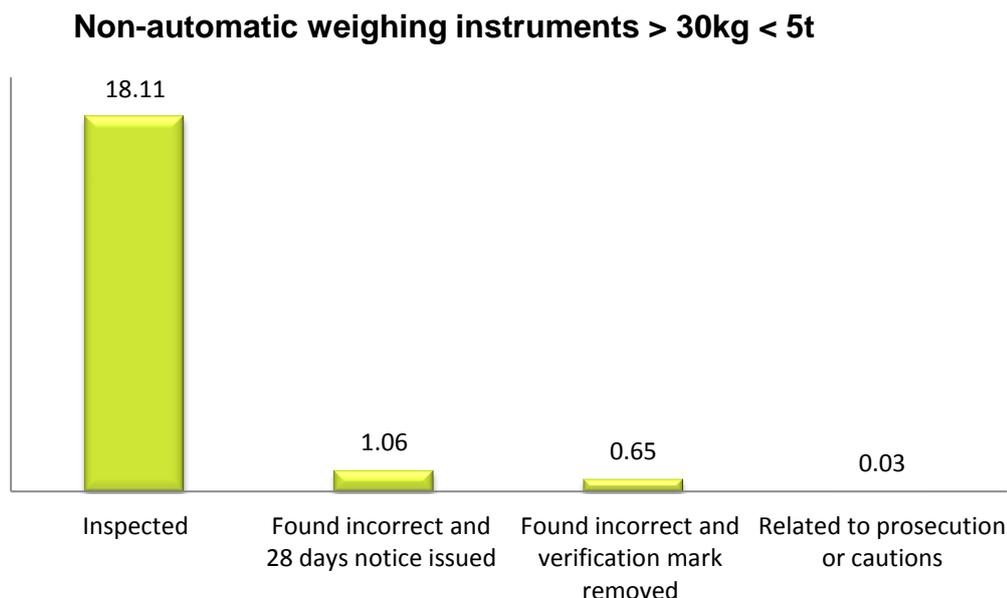
In May 2011, LG Regulation published a report that summarised the outcomes of the project.

- There were 352 weighbridges at landfill and recycling centres tested. 262 were found to be within the legal tolerance and 90 were found to be outside of the legal tolerance. This equates to approximately 25.5% of weighbridges being outside their legally allowable tolerance.
- The type approval certificate was checked for 36% of weighbridges and found to be compliant. There were no recorded instances of instruments not complying with TAC's but 45% were not checked. The form was not completed for 18% of the inspections. It is not clear why they were not checked, and we would be unable to draw conclusions as to whether the instruments that were not checked were in compliance with the TAC.



NMO have agreed to coordinate a second phase of the project for the financial year 2011 – 2012, in order to determine any changes in levels of compliance.

2. NAWIs >30kg <5t



Graph 4: Action taken for NAWIs >30kg <5t

The graph shows that the number of NAWIs >30kg <5t found incorrect and issued 28 days notice is 1.06% which is just below the average for all instruments and the number found incorrect and the verification mark removed is 0.65%, 0.4% lower than average. Six pieces of equipment in the UK were related to prosecution or cautions.

Two of >30kg <5t NAWIs related to prosecution or cautions were located in the Stockton region. The case concerned a scrap metal dealer who had converted his detached garage into a business premise. He was not registered with trading standards as a scrap metal dealer and was on the Police radar due to the local stolen metal that was going through his hands. In attendance with police, trading standards seized a platform weighing machine from the garage that had not been verified as fit for use for trade.

Despite this the scrap dealer was soon back in business and trading standards officers revisited with Police in October 2010 and again seized an unstamped platform machine.

In February 2011, after pleading guilty to 2 offences contrary to Section 11 of the Weights and Measures Act and 2 offences contrary to Section 1 of the Scrap Metal Dealers Act 1964 the offender was fined and the forfeiture of both machines.

In Leicestershire a routine inspection was conducted at the premises of a scrap metal merchant on 7th September 2010. During this visit a platform scale installed at the premises was tested for accuracy. The scale was found to be inaccurate (in the businesses favour) and was not stamped for trade use. An advisory/warning notice was issued to the owner. On the 28th September 2010 a re-visit to the premises was carried out. At this time it appeared that the scale was still in use and the trading

standards officer was informed by the owner that he had instructed an employee to order a new scale, and an 'out of order' notice was to be put on the scale (this was not there at the time).

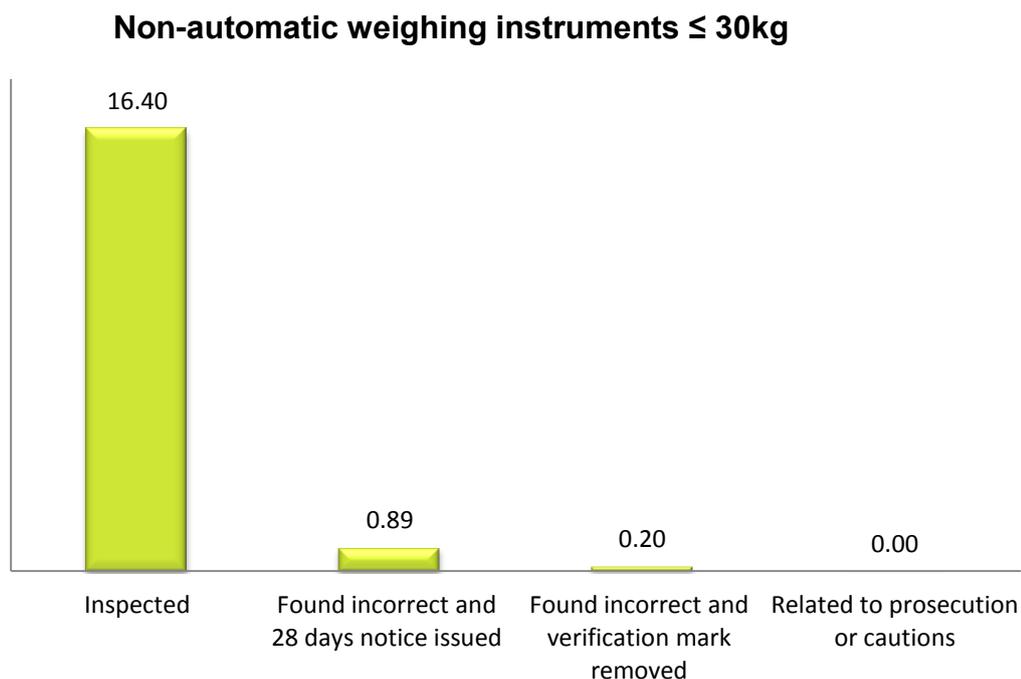
On the 29th September 2010 a letter was sent to the owner asking for acknowledgement of actions taken regarding the scale within 14 days. No response to the letter was received. On the 27th October 2010, a known quantity of scrap metal was taken to the trader by an officer posing as a member of the public. The metal was purchased, and the scale in question was used to determine the weight and subsequently the price to be paid. The price given was in fact more than the weight of the metal, as the container holding the metal was included in the weight of the metal. The scale was re-tested following the sale and was found still to be inaccurate and weighing in the company's favour. The headwork from the scale was seized at this time to prevent the company from continuing to use the scale. The owner obtained a new, stamped scale soon after the visit. A formal caution resulted.

Two further >30kg <5t NAWIs related to a scales fitter found guilty for incorrectly applying his employers' notified body stickers (stamps) to two weighing scales at a scrap metal dealers. The guilty plea was given by a fitter approved for EC Verification and took place on the 14 June 2011 at Kingston Magistrates Court. He was charged under Reg 22(1) of the Non Automatic Weighing Instruments Regulations 2000 and fined £250 with £300 costs and a £15 victim surcharge. Officers from Kingston Trading Standards initially found two scales at a scrap metal dealer without the appropriate stickers. After a number of visits which included giving advice to the trader, the scales were eventually presented with appropriate stickers. However, things just did not seem right and when enquiries were made it came to light that the fitter had illegally used his employer's stickers for a private job.

NMO were advised and as a result contacted all the certification bodies and the United Kingdom Weighing Federation to prevent this type of incident from occurring again. It is understood that the scale company involved have now improved the control of their stickers. This illegal application of the stickers would not have been uncovered had it not been for the good detective work of a Trading Standards Officer.

These cases go to highlight the current prevalence of scrap metal trading and the fundamental job that local authority trading standards play in returning businesses to legal compliance. The much publicised increase in demand for recycled metals such as lead and copper has lead to a boom in the scrap industry, as well as an increase in theft of metals. Posing the question, due to the rise in demand is the issue of non compliance among scrap dealers a growing nationwide risk to consumers?

3. NAWIs ≤30kg



Graph 5: Action taken for NAWIs ≤30kg

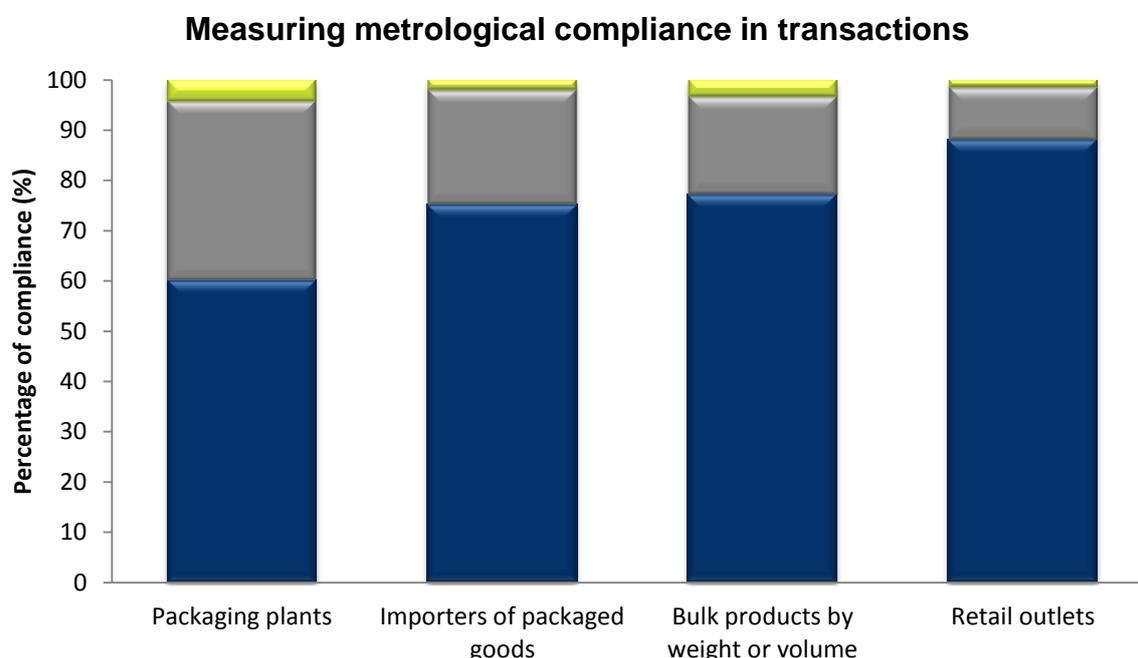
The graph shows that the number of NAWIs ≤30kg found incorrect and issued 28 days notice is 0.89% and the number found incorrect verification mark removed is 0.20% these results are lower than the average for all instruments. However, there were five pieces of equipment relating to prosecution or cautions, although, this did not impact the percentage as the reported actual or estimated number of NAWIs ≤30kg was very large at 173,171 UK wide which averages at 1219 pieces of equipment in each LWMA.

A supermarket was found guilty on four counts after being prosecuted by Bromley Trading Standards. The first count was of short weight, the other three were equipment related. One NAWI was found to contravene Section 11(2)(a) and (3) of the Act, having not been passed by an inspector or approved verifier as fit for such use. Two other NAWIs were contrary to Section 17(1) of the Act and were deemed to be false and unjust.

Sandwell prosecuted a trader who was found guilty of six overcharging offences, as well as fraud and obstruction. His scales were subsequently forfeited and destroyed.

Transactions in goods

Transactions in goods relates to the second section of the form, which requires authorities to indicate the metrological compliance in transactions. It targets four types of business; packaging plants, importers of packaged goods, those selling bulk products by weight or volume and retail outlets. It should be noted that approximately 70% of all weights and measures transactions are made through pre-packages and 30% weighed or measured at the point of sale using instruments (Deloitte 2009).



Graph 6: Measuring metrological compliance in transactions

Key:

	Businesses liable to inspection but not visited
	Businesses liable to inspection and visited
	Non compliant businesses

The results for compliance in transactions are similar to the previous year, only 1.8% of all businesses which were liable to inspection and visited were non compliant. These non compliances were primarily in packaging plants which had a 4.3% non compliant business rate, seconded by bulk products by weight or volume at a 3.4% rate, importers of packaged goods at 2.1% and retail outlet businesses 1.6%. However, similarly to 09/10 (in which 15% of retail outlets were inspected) only 10.5% of retail outlets were visited and although 1.6% of non conformities were found in 10/11 this is a relatively small sample especially when comparing it to the 39% of packaging plants which were inspected.

WELMEC 2010 Importers Project

The UK figures from The WELMEC 2010 Importers project found that from forty-five importers' products surveyed at the retail level seven of the importers (16%) were not known before the project.

Six of the forty-five importers (13%) had the packaged goods stored in another authority's (LWMA) area. From the information regarding the 6 importers with their warehouses in another LWMA's area one (13%) of the LWMA's admitted not knowing about the store.

The project identified that there is a substantial proportion of importers of which LWMA are not aware of. This calls into question whether it is dangerous to assume their compliance is similar to those visited as from past experience when in all probability they may not be aware of their responsibilities.



Not subjecting importers to the same level of compliance checks as the importers and packers that are known may well be permitting non-compliant packages onto the market and the UK will not be meeting the responsibilities placed on 'competent departments' in Directive 76/211/EEC at Annex I.5 of carrying out checks at importers premises.

A potential measure for trading standards could be a project based on investigating the possibility of identifying all importers (using the uktradeinfo website) in their area & ensuring that all new importers get a visit and check – or if their premises are in another LWMA's area that the other LWMA is informed of the packages being in their area for a check. If the importer is claiming to rely on 'evidence' then the trading standards should validate the 'evidence' by appropriate quantity checks.

Conclusion

The risk matrix:

As a result of the data collected from section 70 returns 10/11, the weights and measure Risk Matrix 2010 has been reviewed, updated and reproduced. By consolidating all of the data the following categories have been plotted in accordance with this year's results; LFMI's, weighbridges, NAWI's ≤30kg, NAWI's >30kg <5t, AWI's, weights, length measures and ILMI's.

The four business types included in the measuring metrological compliance in transactions part of the form have also been plotted in accordance with this year's results; packaging plants, importers of packaged goods, those selling bulk products by weight or volume and retail outlets.

The items which have changed category are;

- Importers of packaged goods have been moved back to a higher red risk category from the amber category they were downgraded to in the last report. In the Risk Matrix 2010 they were 'possible failure' and 'high impact' and now they are 'likely to fail' and 'high impact'. This is due to the increase in the percentage of non compliance and the WELMEC Importers project that found authorities may be unaware of a large number of importers.
- In light of the recent project findings on the compliance of Length Measures they have been moved from 'very unlikely' and 'low impact' to 'possible' and 'low impact.'
- Scrap metal dealers have been added to the Risk Matrix owing to the emergence of legal prosecutions against cases of non-compliance. They have been listed as 'possible' and 'high impact'.
- Weights have been moved from 'very unlikely' to 'unlikely' and remaining as 'high impact' due to the 20% increase in the number found incorrect and the obliteration of stamp. This however only accounts for 0.88% of the number of weights inspected.

Potential for failure → Impact of Risk ↓	Very likely	Likely	Possible	Unlikely	Very unlikely
Very high	Weighbridges and scales ≥5000kg		Nonautomatic weighing instruments >30 kilograms but <5 tonnes & Automatic weighing instruments & <i>Bulk fuel</i>		
High		<i>Beer measuring instruments & Packaging plants</i>	Nonautomatic weighing instruments ≤30 kg & Liquid fuel measuring instruments & Scrap metal dealers	Weights	Intoxicating liquor measuring instruments
Low			<i>Liquefied petroleum gas & Bulk products by weight or volume & Retail outlets</i>	<i>Dipsticks</i>	
Very low			Length measures		

Graph 7: Risk Matrix 2011

Overall the inspection rate of all reported equipment is 18.8% a slight fall from the 19% of 2009/10 but 6.3% lower than the 25% rate of 2008/09, but remains important in times of financial worry as consumers (particularly vulnerable consumers) need to have complete confidence in the level of protection they receive from local government.

Recommendations

1. To maintain the risk based approach to weights and measures inspections, NMO will promote the findings of the section 70 report, the risk matrix and these recommendations to all local authorities.
2. To promote a reduction in the rate of non compliance resulting in improved consumer protection and fair competition in the future.
3. To encourage LWMA's to take part in authority, regional and national metrology projects and to submit the results to the NMO.

Robert Harper
Regulation Policy Team,
National Measurement Office
(NMO), February 2012

Annex A - Authority Section 70 Participation

Aberdeen City	✓ Doncaster	✓ Kent	✓ Reading	✓ Walsall	✓
Aberdeenshire	✓ Dorset	✓ Kingston upon Thames	✓ Redbridge	✓ Waltham Forest	✓
Angus	✓ Dudley	✓ Knowsley	✓ Redcar & Cleveland	✓ Wandsworth	✓
Argyll & Bute	✓ Dumfries & Galloway	✓ Lambeth	✓ Renfrewshire	✓ Warrington	✓
Barking & Dagenham	✓ Dundee	✓ Lancashire	✓ Rhondda Cynon Taff	✓ Warwickshire	✓
Barnet	✓ Durham	✓ Leicester City	✓ Richmond	✓ West Berkshire	✓
Barnsley	✓ Ealing	✓ Leicestershire	✓ Rochdale	✓ West Dunbartonshire	✓
Bath & NE Somerset	✓ East Ayrshire	✓ Lewisham	✓ Rotherham	✓ West Lothian	✓
Bedford	✓ East Dunbartonshire	✓ Lincolnshire	✓ Rutland	✓ West Sussex	✓
Bexley	✓ East Lothian	✓ Liverpool	✓ Salford	✓ West Yorkshire	✓
Birmingham	✓ East Renfrewshire	✓ Luton	✓ Sandwell	✓ Westminster	✓
Blackburn	✓ East Riding	✓ Manchester	✓ Scottish Borders	✓ Wigan	✓
Blackpool	✓ East Sussex	✓ Medway	✓ Sefton	✓ Wiltshire	✓
Blaenau Gwent	✓ Edinburgh	✓ Merthyr Tydfil	✓ Sheffield	✓ Windsor & Maidenhead	✓
Bolton	✓ Enfield	✓ Merton	✓ Shetland	✓ Wirral	✓
Bournemouth	✓ Essex	✓ Middlesbrough	✓ Shropshire	✓ Wokingham	✓
Bracknell Forest	✓ Falkirk	✓ Midlothian	✓ Slough	✓ Wolverhampton	✓
Brent and Harrow	✓ Fife	✓ Milton Keynes	✓ Solihull	✓ Worcestershire	✓
Bridgend	✓ Flintshire	✓ Monmouthshire	✓ Somerset	✓ Wrexham	✓
Brighton and Hove	✓ Gateshead	✓ Moray	✓ South Ayrshire	✓ York	✓
Bristol	✓ Glasgow	✓ Neath Port Talbot	✓ South Gloucestershire		
Bromley	✓ Gloucestershire	✓ Newcastle Upon Tyne	✓ South Lanarkshire	✓	
Buckinghamshire	✓ Greenwich	✓ Newham	✓ South Tyneside	✓	
Bury	✓ Guernsey	✓ Newport	✓ Southampton	✓	
Caerphilly	✓ Gwynedd	✓ Norfolk	✓ Southend	✓	
Cambridgeshire	✓ Hackney	✓ North Ayrshire	✓ Southwark	✓	
Camden	✓ Halton	✓ North East Lincolnshire	✓ St. Helens	✓	
Cardiff	✓ Hammersmith & Fulham	✓ North Lanarkshire	✓ Staffordshire	✓	
Carmarthenshire	✓ Hampshire	✓ North Lincolnshire	✓ Stirling	✓	
Ceredigion	✓ Haringey	✓ North Somerset	✓ Stockport	✓	
Central Bedfordshire	✓ Harrow	✓ North Tyneside	✓ Stockton on Tees	✓	
Cheshire East	✓ Hartlepool	✓ North Yorkshire	✓ Stoke	✓	
Cheshire West & Chester	✓ Hampshire	✓ Northamptonshire	✓ Suffolk	✓	
City of London	✓ Haringey	✓ Northumberland	✓ Sunderland	✓	
Clackmannanshire	✓ Havering	✓ Nottingham City	✓ Surrey	✓	
Comhairle Nan Eidean Siar	✓ Herefordshire	✓ Nottinghamshire	✓ Sutton	✓	
Conwy	✓ Hertfordshire	✓ Oldham	✓ Swansea	✓	
Cornwall	✓ Highland	✓ Orkney	✓ Swindon	✓	
Coventry	✓ Hillingdon	✓ Oxfordshire	✓ Tameside	✓	
Croydon	✓ Hounslow	✓ Pembrokeshire	✓ Telford	✓	
Cumbria	✓ Hull	✓ Perthshire & Kinross	✓ Thurrock	✓	
Darlington	✓ Inverclyde	✓ Peterborough	✓ Torbay	✓	
Denbighshire	✓ Isle of Anglesey	✓ Plymouth	✓ Torfaen	✓	
Derby	✓ Isle of Wight	✓ Poole	✓ Tower Hamlets	✓	
Derbyshire	✓ Islington	✓ Portsmouth	✓ Trafford	✓	
Devon	✓ Kensington & Chelsea	✓ Powys	✓ Vale of Glamorgan	✓	



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