



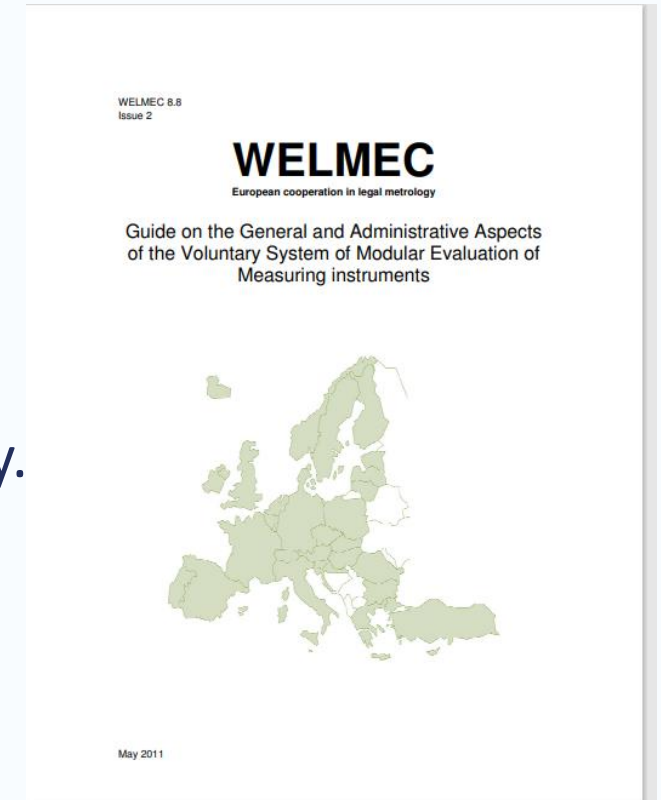
The use of NAWI's in conjunction with POS systems

10th September 2024

Introduction



- Non-automatic Weighing Instruments are often placed on the market connected to other components.
- These are known as peripheral devices.
- Not to be confused with modules which are governed separately.
- These are governed by the WELMEC Guides 8.8
- Controlled by Parts Certificates, Evaluation Certificates and Test Certificates



Peripheral Devices

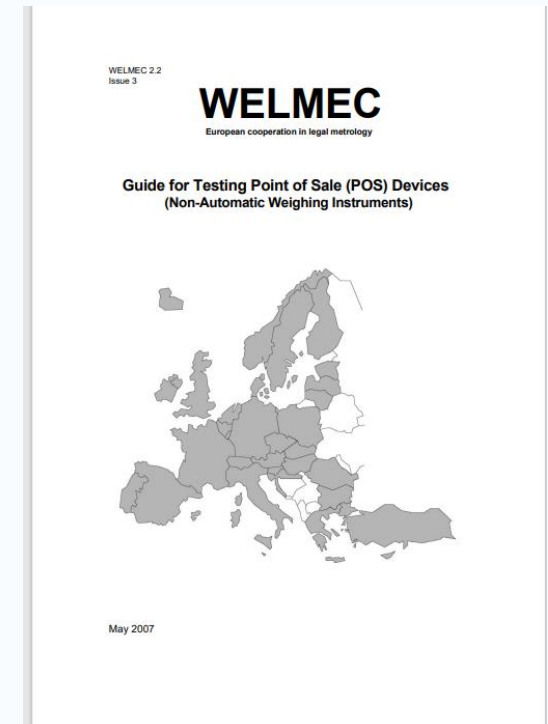
- These are defined in EN45501:2015
- Clause 3.10.3

Peripheral recipient devices need to be examined and tested only once while being connected to a weighing instrument, and may be declared as suitable for connection to any verified weighing instrument having an appropriate and protective interface

- EN 45501 also includes other clauses on peripheral devices
- Table 14 of EN45501 –covers a range of different scenarios

POS Systems

- This refers to Point of Sale Systems
- Appear in a wide range of applications, commonly seen in retail but do regularly appear in industrial settings such as quarries and waste treatment plants
- Complicated by no-legal definitions
- There are two old WELMEC Guides which cover POS systems and are a useful starting point (WELMEC 2.2 and 2.5)



POS Systems



- WELMEC 2.2 offers us this definition.

A POS device is a separate module according to the modular guide... connected to a NAWI, that receives transaction data and together with data not derived from the weighing instrument presents transaction information to the customer

- This will clearly cover the price to pay function that multiplies the weight and a stored price to create the invoice

POS Systems – What does this mean?



- If you are placing an instrument on the market or putting it into service
- AND it is connected to a peripheral that undertakes a legally controlled function
- The peripheral must :
 - Have a test certificate – It will bear a CE mark or a UKCA mark to show it is compliant with the regulations that apply to it
 - Must be allowed by the type examination certificate

POS Systems – What does this mean for you



- This means that you cannot connect the instrument AND conformity assess it to any peripherals.
- Problem if the customer has their own specific POS and would like to connect it.
- The Declaration of Conformity must declare the peripherals that you have conformity assessed.
- Should include certificate numbers if it is conformity assess it with the POS attached

POS Systems – What does this mean for you



- Common practice in the industry that a new contract will lead to the indicators on an instrument being changed.
- This will mean that this becomes a new instrument and must be initially conformity assessed. (although it is reality an old instrument)
- This means that the peripherals must comply as if it was a new instrument
- If the peripheral does not comply it must NOT be conformity assessed with it attached.
- This MUST be reflected in the Declaration of Conformity

POS Systems – What does this mean for you



- The same principle will apply if you place on the market an instrument that could (may) be connected to a peripheral that you are unaware of
- The conformity assessment and the Declaration of Conformity must relate just to the NAWI
- If a customer later attaches that to a POS - it becomes a new instrument
- Must be conformity assessed in its new condition.
- Problem with airline baggage weighers

POS Systems – What does this mean for you



- The Non-automatic Weighing Instrument Regulations 2016 include a clause called the “Preliminary Observation”

Where an instrument includes, or is connected to, more than one indicating or printing device used for the applications listed in points (a) to (f) of Article 1(2), those devices which repeat the results of the weighing operation and which cannot influence the correct functioning of the instrument shall not be subject to the essential requirements if the weighing results are printed or recorded correctly and indelibly by a part of the instrument which meets the essential requirements and the results are accessible to both parties concerned by the measurement. However, in the case of instruments used for direct sales to the public, display and printing devices for the vendor and the customer must fulfil the essential requirements.

- This has been interpreted as meaning:
 - If the approved instrument includes approved alibi memory (a feature on some scales that stores weighing data, such as the weight, date, and time of a weighing)
 - The peripheral do not have to be approved – (except for display and printing devices on instruments for direct sales to the public)

POS Systems – What does this mean for you



- The preliminary observation means that if you place a weighing instrument on the market with an alibi.
- The customer can connect the instrument to peripherals that are not approved.
- This must be reflected in the Declaration of Conformity
- Would appear a useful way of limiting liability for your instrument after you have placed it on the market



Any questions?