



## **RESPONDING TO CONSULTATIONS FROM EURACHEM LIAISON BODIES**

### **Procedural guidance**

#### **Introduction**

From time to time, Eurachem is invited to provide comment on documents from stakeholder organisations. This guideline provides procedures for gathering and returning comment.

#### **General**

Comments from Eurachem should normally be returned to the consulting organisation by the Eurachem Secretary. Time limits for comment within Eurachem must allow sufficient time – usually a minimum five working days - for the secretary to collate comments and respond within the required time scale.

Where time permits, Eurachem should plan to provide a response that constitutes a considered, consensus view that is representative of all its members and in which any apparently conflicting views have been considered and resolved. The Secretary should then advise the consulting organisation that the response is a consensus view after consideration of all comments received.

It is not always possible to establish a consensus view within a limited time for response. Where the required response time does not permit review and resolution of differing views, all comments received from Eurachem members should be collated and provided without amendment or restriction. Where this is the case, the Secretary should advise the consulting organisation that the comments are individual comments, provided as received, and may not represent a consensus view.

#### **Responsibilities**

In order to provide prompt distribution, the Chair, in consultation with the Secretary and with relevant working group Chairs, should decide on the procedure to be followed in a given instance and on the date for return of comments to the Secretary. The Secretary should then forward the document for Eurachem comment as agreed with the Chair. The Executive should normally be advised of the time scales and process and may suggest wider circulation.

**NOTE:** Not all consultations require a collated response from Eurachem. The Chair may elect to forward a consultation document for information only, or for information so that individuals can respond through other routes (for example via a national standards body).

#### **Procedures**

##### *Technical documents*

Where a document deals primarily with a technical topic that falls within the area of expertise of a Eurachem working group, responsibility for collating and reviewing comments should normally rest with the relevant working group. The WG Chair should arrange for circulation to their WG members, collection of WG member comments, and (if time permits) discussion of all of the comments in order

to resolve differences. The document should additionally be circulated to GA members with a request to send responses to the relevant WG chair, within a time set by the WG chair. The WG Chair should then provide the collated comments to the Eurachem Secretary for transmission to the consulting body. Where time is limited, the Secretary may request that the WG chair provide comment directly to the consulting organisation on behalf of Eurachem; in such cases a copy must be provided to the Secretary for Eurachem records.

#### *Policy documents and 'horizontal' documents*

Policy documents cover general policies and regulations, including Government or EU policies and consultations. 'Horizontal documents' are documents that touch on a wide variety of technical or policy topics of interest to Eurachem. ISO/IEC 17025 and the international vocabulary of terms in metrology are examples of horizontal documents.

For these types of document, comments should be sought from all Eurachem members and working groups, and the Secretary should collate comments received. Where time permits, the Executive may review the resulting collated comments to formulate a consensus view from Eurachem.

#### *Identification of individuals*

Where the consulting organisation's commenting mechanism provides for identification of the origin of comments, comments should be identified as originating from Eurachem and not from an identifiable individual unless a) the stakeholder requires identification of individuals *and* b) Eurachem members are advised that comments will be forwarded in attributable form.

#### *Avoidance of duplication*

Many Eurachem members have the opportunity to comment on stakeholder documents by a number of different channels; for example, via Eurachem, via CITAC, or via a national standards body or other commenting route.

While Eurachem's view should be informed by its members views, members should avoid submission of identical or near-identical comments through multiple channels as this can give a distorted impression of the scale of support or objection for particular provisions. It is the responsibility of individuals to choose their preferred route for individual comment, to avoid unnecessary duplication, and to advise Eurachem if they have made, or intend to make, similar comments via another route. It is **recommended** that the Secretary remind members of this when inviting comment.

#### **Response**

The Secretary will normally provide the response on behalf of Eurachem.

The response should make clear whether the response is a considered, consensus response or constitutes individual responses, transmitted verbatim, without review. In the latter case the response should indicate that the comments may not represent a consensus view.

Where no comments are received by the due date for internal comment, the Secretary should normally advise the consulting organisation that no comments have been received.

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