

The Pressure Equipment Directive

Introduction

The driving force behind the Pressure Equipment Directive 97/23/EC is the Achievement of free movement of goods within the EEC.

In May 1985, European Community ministers agreed on a 'New Approach to Technical Harmonisation and Standards' as a vehicle by which this goal would be achieved.

The 'New Approach Directives' set out essential requirements for safety, and were usually written in general terms, which must be met before products may be placed on the market in the United Kingdom or anywhere in the Community. Mandated, harmonised European standards being the main way for business to meet the 'essential requirements' of a Directive.

The Directives also prescribe how manufacturers are to demonstrate that products meet the 'essential requirements'. Products meeting the requirements must bear a CE mark, which means that they can be sold anywhere in the 15 member states of the European Community, Norway, Iceland and Liechtenstein. Together these 18 states constitute the European Economic Area.

The Pressure Equipment Directive (PED) is one such Directive. It has been implemented in UK law by the Pressure Equipment Regulations 1999.

Scope of the Regulations

The regulations apply to the design, manufacture and conformity assessment of pressure equipment and assemblies of pressure equipment with a maximum allowable pressure greater than 0.5bar.

Transitional Arrangements

The Directive entered into force on 29 November 1999 with a 2 year transitional period to give manufacturers an opportunity to comply by 29 May 2002. The reality is that compliant product is still only partially available. The result of this is that HRP will have both compliant and non-compliant product in stock on 30 May 2002.

Article 20, Section 3 of the Directive states that once a product has entered the distribution chain (sold by the manufacturer) there are no restrictions on the subsequent sale of pre-PED pressure equipment (through a distribution chain for example) or when such equipment is eventually put into service.

As a wholesaler, HRP is not a manufacturer and as such forms part of the distribution chain and is therefore able to supply non-CE marked product that was delivered into stock prior to 29 May 2002

Categorisation of Products

As a way of assessing individual components, the design (for adequate strength) and application limits of each one is categorised by taking into account it's internal volume/diameter and the maximum pressure for which it has been designed.

There are four categories into which products can be placed as follows: -

SEP: Products assessed as 'Sound Engineering Practice' must be designed and manufactured in accordance with existing European standards and need only be accompanied by adequate instructions for use and must be marked such that the manufacturer can be identified; a CE mark must not be applied.

Cat I: A CE mark must be applied to products in this category and like SEP products must be accompanied by adequate instructions and manufacturers identification marks. A declaration of

Cat II, III & IV: Products are placed in these categories dependent on their internal volume, maximum allowable pressure capability and intended application. As for Cat I products these must also have instructions, manufacturers identification marks and declarations of conformity. However, the manufacturer cannot self assess them. The design, the materials used, the manufacturing process, and testing procedures relating to each product must be assessed and approved by an Authorised Notified Body (Lloyds, TUV etc.) and a CE mark applied under their authority.

It is the responsibility of the manufacturer or the importer into the European Economic Area to assess products, allocate categories and to provide the necessary information.

As a wholesaler HRP is classed as part of the distribution chain and is therefore not responsible for the assessment or the compilation of the necessary information, although this information will be available through HRP as manufacturers make it available.

HRP's role as a Wholesaler

The entire HRP product portfolio has been evaluated against supplier's data and the Cat I and above products have been identified. This evaluation process has also identified SEP products and where a product has been classified at this level HRP need take no specific action, and products will continue to be supplied without any change to current practise.

As a general guide Cat I and above (CE marked) products encompass the following types:-

- a) Valves 1.3/8" and above. This includes ball valves, non-return valves, solenoid valves, and pressure regulating valves.
- b) Oil separators and reservoirs.
- c) Liquid receivers generally larger than 1litre capacity.
- d) Suction Accumulators and Discharge Mufflers.
- e) All Pressure Relief Valves.
- f) Vibration eliminators 1.5/8" and above.
- g) The larger Copeland scroll and Tecumseh compressors.
- h) Some high pressure switches.

Typical products that fall into the SEP category are:-

- a) Low pressure switches and thermostats, which are covered by the low voltage directive.
- b) High pressure switches that are not intended to be the 'last line of defence' (Systems with PRV's)
- c) Copper Tube and Fittings.
- d) All Semi-hermetic compressors.
- e) Small hermetic and Scroll compressors which are covered by the low voltage directive.
- f) Small driers, sight glasses, rotalock valves, and small expansion valves.
- g) Valves 1.1/8" and smaller. This includes ball valves, non-return valves, solenoid valves, and pressure regulating valves.
- h) Vibration eliminators 1.3/8" and smaller.

Refrigeration Condensing Units

The compressor manufacturers represented by HRP are members of Asercom who have agreed that since a condensing unit does not form a fully functional complete system as set out in the PED, it should be considered a component of a system and as such condensing units will not carry a CE mark.

The components that are used in the assembly of a unit will however be required to be PED compliant (Liquid receivers, some larger compressors, Pressure relief valves etc.)

The current classification relating to condenser coils (and evaporator coils) is that they constitute 'tubing' and as such are excluded from the PED.

Air Conditioning Products.

The current understanding of the manufacturers of the air conditioning products supplied to HRP is that they will not be affected by the PED by virtue of the small pipe work sizes that are employed and the fact that there are no liquid receivers in these systems. The same logic as for refrigeration condensing units can also be employed since this equipment comprises an indoor unit (evaporator) and an outdoor unit (condensing unit) and neither are fully functional complete systems.

The HRP Position.

The Directive states that products that are non PED compliant shall not be "placed on the market" after 29 May 2002

The interpretation from the European web site of the EEC (<http://ped.eurodyn.com>) is that the first placing on the market occurs when the original manufacturer (or importer into the ECA) sells it to HRP. This statement does not cover subsequent sales in the distribution chain consequently this means that customers can continue to use components that are already in HRP's stock after 29 May. It is therefore our intention to continue supplying such components and to allow natural stock rotation to displace non-CE marked components with CE marked stock, as it becomes available.