

**Directive 97/23/EC****Keywords :**

CE marking

Pi marking

Pressure equipment

Transportable pressure  
equipment**Directive references:**

Article 1 §3.19 - 97/23 EC

**Adopted by WPG:** 28/01/2013**Adopted by CLAP:** 28/01/2013**Subject:** Scope – Both the CE marking for the PED and the PI mark for the TPED**Question:** Is it permissible to affix both the CE marking for the PED and the PI mark for the TPED on an item of pressure equipment?**Answer:** Yes. This double marking proves that the item of pressure equipment complies with both directives, and can be used in both contexts without further assessment.

A similar item bearing only the p mark could also be used for pressure purposes outside the scope of ADR/RID but consideration would need to be given to possible national regulations, or to PED if included in a PED assembly.

Hence, if a manufacturer intends a product to be used in both contexts and designs and manufactures it accordingly so that it complies with both applicable Directives, it shall bear both markings, to the extent foreseen by each Directive (e.g. no CE marking for SEP equipment (Article 3 paragraph 3), and no p-marking for certain accessories).

If the manufacturer of the product only foresees it to be used in the scope of one of the Directives, only one Directive applies and one marking (as far as applicable) shall be affixed (see also CLAP 153 - Guideline 1/33).

See also CLAP 100 - Guideline 1/14 and CLAP 153 - Guideline 1/33.

Reason: While in principle, Article 1.3.19 of the PED excludes equipment covered by ADR/RID, it is not always possible for the manufacturer to know whether or not a particular item of equipment he manufactures will during its use come into the scope of these International Transport Agreements. This is in particular true for accessories, which may well be used for both purposes with no technical alterations. In such a case, it would only be possible after the user has taken the product into service, to know, which of the two Directives does not apply to the product. Until then, both Directives shall be considered to be applicable. Such double marking would not violate the provisions of Article 16 of the PED, as, up to the moment the product was placed on the market, it was not excluded from the scope of the PED. When at a later point in time the product is de facto used in the context of a transportation of dangerous goods, the fact that it bears the CE marking is insignificant.

Modifications compared to the previous adopted version: Editorial correction on 2004-09-16.