

**Guideline**

**G-04**

**CLAP**

**FORM N°X140**

**Version : 1**

**Directive 2014/68/EU**

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**Directive References:** Annex I § 3.1.5

**Subject:** ESR on materials - Traceability

**Question:** What are the 'suitable means' for traceability referred to in Annex I, section 3.1.5?

**Answer:**

The objective of traceability is to avoid any doubt about the material specification used for a type of equipment. The suitable means shall be determined according to the type of equipment and its manufacturing conditions: for instance, complexity of the product, unitary or serial products, risk of mixing of material grades, etc.

These means range from physical marking of individual items by stamping or colour coding to procedural methods. It is not always necessary for the identification of material to be linked to a specific delivery.

The traceability system should be proportionate to the risk of mixing material grades during the manufacturing process. When there is no such a risk, the system may be limited to administrative means.

Note 1: The traceability system of the manufacturer shall allow him to provide to a market surveillance authority, upon request, the technical documentation related to a specific item of pressure equipment and the material certificate.

Note 2: When a national authority applies the safeguard clause for a particular product due to the material, the decision will relate to all products made from the same material grade specification, if the traceability system does not allow the identification to relate to (a) specific delivery (ies). The same will apply if a manufacturer withdraws non-compliant or defective products from the market.