

**De:** Jollands, Sally Sally.Jollands@Luxfer.com  
**Objet:** RE: \*EXTERNAL\*LUXFER SCUBA diving cylinder  
**Date:** 7 octobre 2022 à 16:56  
**A:** Gerald NAIGEON gerald.naigeon@ffessm.fr



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Attention : Ce message provient de l'extérieur de l'organisation.

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Bonjour Gerald,

Nous avons parlé avec Arrowhead comme ils sont l'organisme notifié et voici la réponse de notre ingénieur principal :

Dear Mr Naigeon,

With regards to your queries concerning the markings applied to SCUBA cylinders manufactured by Luxfer Gas Cylinders in the USA and supplied for use in Europe under the Pressure Equipment Directive (PED) 97/23/EC, now 2014/68/EU.

Unfortunately, the manufacturing facility who manufactured these cylinders is no longer part of Luxfer Gas Cylinders, however, I will try to answer your questions on their behalf.

The cylinder designs and markings were approved by a PED Notified Body, namely Arrowhead Industrial Services, and it is their reference number 1266 and inspection mark that the cylinders.

Looking at the points raised:

1. **Absence of marking of the volume of the bottle.** – The Pressure Equipment Directive 2014/68/EU, previously 97/23/EC, is non-specific regarding what information must be stamped. Markings have to be agreed with the approving Notified Body and contain appropriate information for safe operation and use. The volume was not considered to be an essential requirement since filling is controlled by pressure and has been omitted.
2. **The CE sign is not immediately followed by the notified body number 1266. Between the CE and 1266 is the ISO 7866 standard.** – For manufacturing/logistical reasons, the CE mark is applied at the beginning of the line of stamping with the Notified Body following further along the line. Whilst it is generally accepted that the identification number follows immediately after the CE mark, article 15. of the 97/23/EC directive does not specifically say this and the arrangement was deemed acceptable to the Notified Body.
- 3) **The bottom line marking is made partly on the nose and partly on the cylindrical part, which means that some mandatory markings are not completely formed (CE, GB, 1266).** I think that this is very subjective. I agree that the markings are not stamped to the same depth on the bottom line on one of the cylinders, but the stamping is still legible.
- 4) **The CE sign does not seem to be made according to the attached sketch (the inner circle of the "C" does not seem to be tangential to the outer circle of the "E", but seems to be difficult to see in all of the photographs, but the one that is clearly visible would seem to me to be OK and in was accepted by the Notified Body responsible for the manufacture).**

One of the main criteria for the CE marking is to ensure traceability and identification of the manufacturer and the inspection body responsible for the pressure vessel should there be problems.

Whilst the basic arrangement differs from that which we use when supplying cylinder from the U.K. the markings applied to these cylinders clearly provide this.

Yours Faithfully,

Simon Nicholson  
Senior Design Engineer

Cordialement,



Established 1897

ders

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Credit Photo : Cécile NAGGON

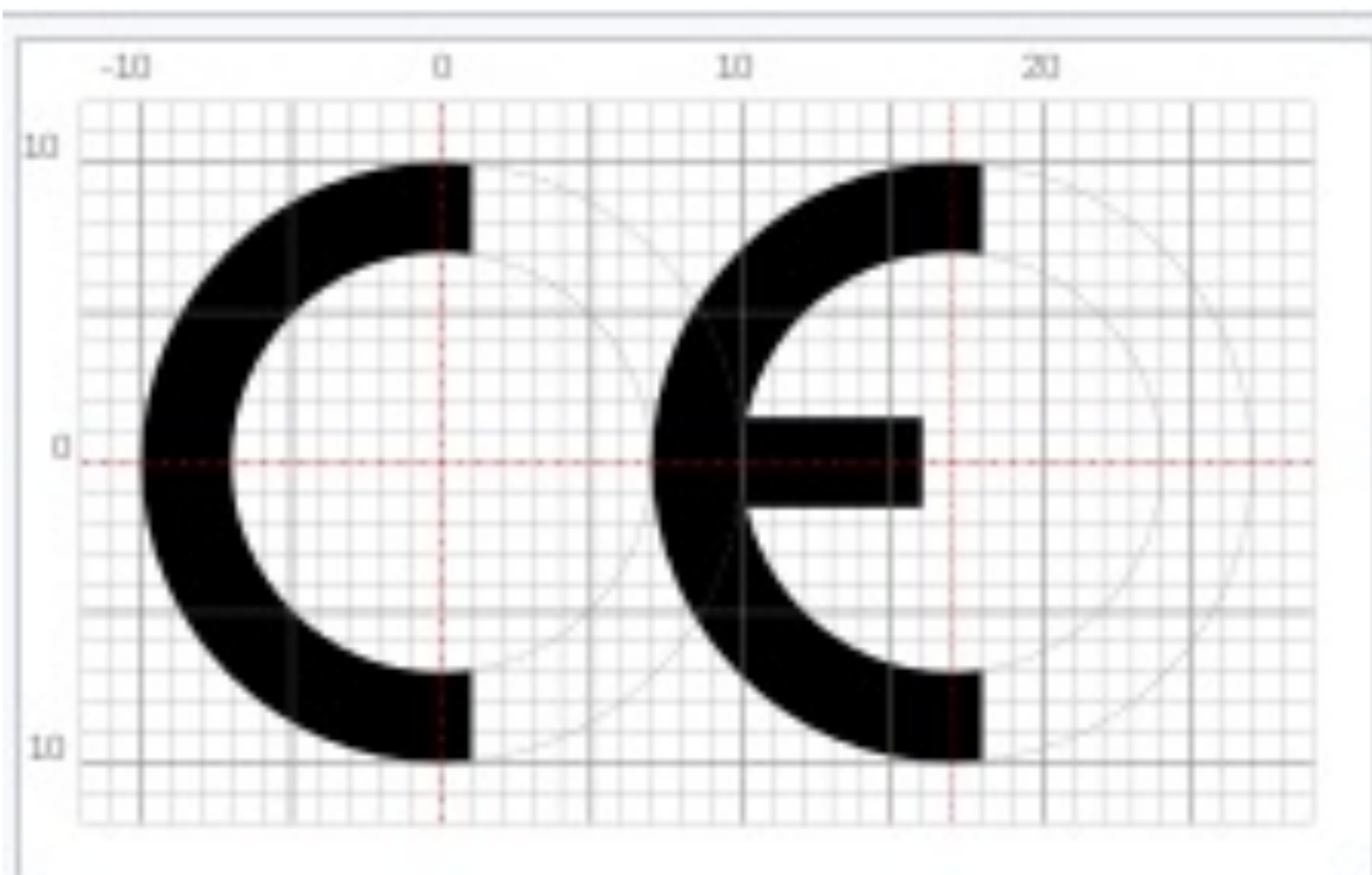


Diagramme de construction du  
marquage.

