

Reference No: CABF-R-022 rev 1	Conformity Assessment Bodies Forum PED/SPV (CABF) CABF
Relation to PED: Article 5	CABF Recommendation
Question:	For complex assemblies, comprising several sub-assemblies and numerous pieces of pressure equipment, hot-commissioning is a long-drawn-out process. During this process some parts of the assembly are utilized by the manufacturer to start-up, test etc. other equipment. Example: A running instrument air system is an essential prerequisite for commissioning of the rest of an assembly. Questions: Is the use of already CE-marked sub-assemblies by the manufacturer of a bigger assembly during his hot-commissioning phase an operation within the scope of national legislation for operation and in-service inspection of pressure equipment? Has the manufacturer of an assembly therefore to subject himself to the rules for registration, operation, inspection prior to service and in-service etc. decreed by the member state in which he erects his assembly? Note: Other national regulations, especially for health and safety on site, are not an issue of this CABF-R and will of course be applicable.
Answer:	No. The obligation for registration, operation, inspection prior to service and in-service lies with the owner.
Reason:	Operation in the sense of national legislation for operation and in-service inspection of pressure equipment starts when an assembly is “put into service”, which is defined as the moment of first use <u>by the end user</u> . (see Blue Guide § 2.3.2)
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Note:	