

# Norwegian report of market surveillance and enforcement action on non compliant Chinese LPG vessels imported to Norway.

The market surveillance action was started when a Norwegian stakeholder reported to The Directorate for Civil Protection and Emergency Planning that non- marked LPG vessels were in circulation.

It was alleged that the vessels failed to comply with the Transportable Pressure Equipment Directive. The vessels are used as stationary vessels for cooking and heating.

Manufacturer of vessels:

- The LPG vessels were of the type LPG 26.2L-1, serial no. 051201-051250 from Laizhou Kingsky Machinery Manufacturing Co., Ltd (KSMM), Shentung Industry Area, Laizhou City, Shandong Province 261428, China.

Actions taken by the Market Surveillance Authority:

- The Directorate decided to ban sale and require withdrawal of the LPG vessels. When it was alleged that the vessels failed to comply with the TPED and it was a large number of vessels, approximately 4000, the importer was asked to stop sale and complete withdrawal of the vessels.
- The letter to the importer was released on our website, see attached letter in Norwegian and the translation to English.
- The Directorate sent a notification of the ban of sale and withdrawal through the Rapex system, see Rapex notification with pictures of the vessel.
- The importer was asked to report every month on vessels destroyed.

Findings from the surveillance:

- The inspected vessels lacked pi-mark and by contacting the importer it was found out that approximately 4000 LPG vessels had been imported to Norway.
- The market surveillance authority inspected some vessels and checked available technical documentation relevant for the vessels, and found that the module system in TPED was wrongly used in addition to the lack of pi-marking of all vessels.
- The declaration of conformity issued by the manufacturer states that the vessel belong to category 2 according to TPED. However, the manufacturer chose a module combination of B and F as required for category 3 in TPED.
- The documentation included an EC-type-examination certificate issued by the notified body. The certificate stated that module B could not stand on its own, and had to be combined with another module. The available documentation showed that the manufacturer had not followed the procedures described in module F. Certificate issued by TÜV Rheinland Group.
- The market surveillance authority has not obtained a written certificate of conformity issued by the notified body as required in module F. However, some technical documents showed that the subsidiary of the notified body was involved in various technical tests.
- According to test report no T051201 it is only inspected and tested samples of a few cylinders out of more than 4000 exported to Norway by the notified body. According to the declaration of conformity issued by the manufacturer the conformity assessment should have been according to the module B and F. As we have seen from the documents available it has been carried out only a few tests of the vessels and the notified body has not carried out the inspections on every vessel as required by module F.
- The importer and Apragaz (Notified Body used as consultant ) examined the technical file and concluded:

1. The cylinders have been welded according to Welding procedures & welders approved according to the relevant EN (with copies of all needed documents).
2. The cylinders have been made according to the drawing N°LPG-14.2-1 (and a copy of the drawing).
3. The cylinders have been heat treated - With duration and temperature.
4. The cylinders have been hydraulic tested at 30 Bar during 30s minimum and that the result of Sammen med Apragaz ble følgende dokumentasjon gjennomgått (Teksten her er gjengitt på engelsk)
5. The cylinders have been welded according to Welding procedures & welders approved according to the relevant EN (with copies of all needed documents).
6. The cylinders have been made according to the drawing N°LPG-14.2-1 (and a copy of the drawing).
7. The cylinders have been heat treated - With duration and temperature.
8. The cylinders have been hydraulic tested at 30 Bar during 30s minimum and that the result of this test was successfully.
9. The cylinders are con form and made according the EN 1442, and all the following tests have been performed successfully:
  10. Mechanical tests (Tensile I Bending / Macrography)
  11. Bursting tests
  12. Radiography
  13. For all the tests and controls, copy of the results signed by the manufacturer.
  14. Note of calculation.
  15. The manufacturer must also be agreed with the necessary stamping which must be added on the cylinders (a proposal of corrected stamping will be made in due time).
16. The importer and Apragaz concluded that the vessels were inadequately marked.
17. Lack of pi-mark on vessel and valve.
18. According to normal ADR marking the LPG vessels should have been marked:
  - a. Top grouping: RC Laizhou KMM N°:XXXXXX
  - b. Middle grouping: PH30 BAR 10XKG 26.2L
  - c. Bottom grouping: EN 1442 B 2007/05

Other outcomes from the surveillance:

- It is only identified one importer in Norway.
- It is not known if the vessels are exported to other EU countries.
- 40 LPG tapping (filling) stations have been handling the vessels.
- Up to now it is recovered approx. 1000 vessels which have been destroyed.
- The parent notified body had issued an EC type examination certificate and clearly stated that this certificate could not stand on its own. It is not clear if this statement had been clearly communicated to the manufacturer and the subsidiary of the notified body.
- This particular case shows the importance of the follow up of subsidiary of notified body and who is responsible for the follow up. A subsidiary of a notified body is an entity that is controlled by the parent company and therefore they have a responsibility in following up the subsidiary.

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