Position Paper on the Continued Relevance of the Simple Pressure Vessels Directive (SPVD)

The European Commission's ongoing evaluation of the regulatory framework for pressure equipment, aiming to assess whether the **Simple Pressure Vessels Directive (SPVD) 2014/29/EU** and the **Pressure Equipment Directive (PED) 2014/68/EU** are still efficient and fit for purpose in ensuring safety and supporting the internal market amid technological and policy developments, must carefully consider the distinct roles and historical purposes of the two Directives. While both Directives pertain to the design, construction, and market placement of pressure vessels, they address fundamentally different categories of equipment and operational needs.

1. Historical and Functional Distinctions

The **SPVD**, originally introduced as Directive 87/404/EEC, was enacted in 1987 to harmonize the diverse national regulations concerning **mass-produced carbon steel or aluminium pressure vessels**—so-called *simple pressure vessels*—commonly used in applications such as **air compressors and braking systems in trucks and trains**. Its aim was to provide a uniform legal framework to ensure safety and facilitate the free movement of these essential industrial products across the EU.

In contrast, the **PED**, introduced a decade later as Directive 97/23/EC, was developed to standardize legislation for a broad spectrum of **industrial pressure equipment** such as pipes, valves, heat exchangers, tanks, and complex systems. The PED was **never intended to cover** the class of products already effectively regulated under the SPVD.

2. The Unique Importance of Simple Pressure Vessels

Simple pressure vessels, particularly compressed air tanks, represent the **most widely manufactured type of pressure vessel in the EU**. These vessels are found not only in every industrial production environment but also in millions of homes—embedded in small compressors commonly sold in consumer retail settings.

Given their ubiquity and functional simplicity, these vessels must meet **minimum safety requirements** to ensure reliable operation under consistent, repeated use. These requirements include:

- **Minimum wall thickness** for shells and ends;
- **Prescribed material properties**, including chemical composition and mechanical strength;
- **Strict manufacturing controls**, including welding procedures and production testing.

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3. Technical Specificity of SPVD vs. PED

The **SPVD** stands out among EU directives for its inclusion of **detailed technical specifications**, outlined in **Annex I**. It specifies exact values for wall thickness, allowable materials, chemical composition, mechanical properties, and manufacturing methods.

Conversely, the **PED** provides only **general essential safety requirements**, leaving significant room for interpretation and requiring extensive conformity assessments by manufacturers and Notified Bodies. If the SPVD were repealed and these products brought under the scope of the PED, this would result in the loss of these critical prescriptive measures—potentially undermining safety standards that have proven effective for decades.

4. Economic and Regulatory Impacts of Repealing the SPVD

Repealing the SPVD and transitioning its scope to the PED would generate **substantial regulatory and financial burdens**, with **no demonstrable safety benefit**. These include:

a) Manufacturing Requalification Costs

Manufacturers of vessels currently under SPVD would be forced to requalify all production processes, materials, and operator certifications under PED rules—incurring significant, **non-value-adding costs**.

b) Regulatory Ripple Effects on Assemblies

Under the current framework, compressors incorporating SPVD-compliant vessels are governed by the **Machinery Directive**, not the PED. Eliminating the SPVD would reclassify such compressors as "assemblies" under PED, **triggering complex requalification procedures** for air compressor manufacturers, again without any safety improvement.

c) Disruption of Existing Products and Supply Chains

Millions of existing and in-stock vessels—compliant under SPVD—would suddenly become **non-compliant** under PED, disrupting the supply chain, affecting inspections and market availability, and **creating legal and practical uncertainty** for users, suppliers, and market surveillance authorities.

5. Proven Safety Record and Market Competitiveness

Since its introduction, the SPVD has **ensured a high level of safety and facilitated free movement within the internal market**. Its robust safety record is demonstrated by the **near absence of serious incidents** involving SPVD-compliant vessels—testament to the effectiveness of its prescriptive safety approach and the expertise of European manufacturers and Notified Bodies.

Moreover, the **cost-efficiency** and **technical clarity** provided by the SPVD have enabled European manufacturers to remain **globally competitive**, particularly in the compressed air sector.

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6. Conclusion and Position

The SPVD remains a **fit-for-purpose regulatory instrument** for a clearly defined and limited class of pressure equipment. Any move to repeal it must be based on compelling evidence that such a change would **enhance safety and market functionality**—which, at present, is lacking.

We therefore **strongly oppose the repeal** of the SPVD. Any revision to the EU regulatory framework should preserve the distinct legal treatment of simple pressure vessels and acknowledge the directive's historical success in ensuring both safety and industrial competitiveness.

Pneurop is the European association of manufacturers of compressors, vacuum pumps, pneumatic tools and allied equipment, represented by their national associations. PNEUROP members are national associations representing more than 200 manufacturers in 7 EU Member States, in the United Kingdom and in Turkey. The European market turnover for the business represented exceeds €20 billion.

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