

Summary: Analysis & Evidence

Policy Option 1

Description:

FULL ECONOMIC ASSESSMENT

Price Base Year 2023	PV Base Year 2023	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: N/A	High: N/A	Best Estimate: N/A

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	Not quantified	Not quantified	Not quantified
High	Not quantified	Not quantified	Not quantified
Best Estimate	Not quantified	Not quantified	Not quantified

Description and scale of key monetised costs by 'main affected groups'

Most of the key costs have not been monetised due to commercial sensitivities. Monetisation has been attempted for familiarisation cost, but the number of businesses in scope is uncertain. The time cost, alongside number of businesses in scope have been estimated.

Other key non-monetised costs by 'main affected groups'

This option is expected to only incur minimal costs, with its purpose being to ease trade frictions and improve the accessibility of trading pressure equipment products in the UK. However, UK certification bodies may encounter some loss of business by allowing EEA bodies to provide certification, as manufacturers may no longer go to the UK bodies to get certification.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	Not quantified	Not quantified	Not quantified
High	Not quantified	Not quantified	Not quantified
Best Estimate	Not quantified	Not quantified	Not quantified

Description and scale of key monetised benefits by 'main affected groups'

Most of the key costs have not been monetised due to commercial sensitivities. Despite many businesses expected to reap significant benefits, these are yet to be quantified, and instead have been provided in a qualitative manner.

Other key non-monetised benefits by 'main affected groups'

For this option, all the benefits have been provided in a qualitative manner. This option reduces costs and removes delays for businesses that trade for pressure equipment by easing trade frictions and making it easier to place pressure equipment products on the UK market. It will also give businesses better access to the latest equipment and allow the commencement or continuation of key projects.

Key assumptions/sensitivities/risks	Discount rate (%)	3.5%
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There is uncertainty on the true scale of impact of the proposal being introduced, with most of the analysis being qualitative. Some quantification has been made on the market size, by matching different business descriptions to the pressure equipment directive. Although regulatory experts helped in this exercise, the description of these business groupings is limited, meaning these figures are estimates. The long-term benefits have also largely been non-quantified, with the assumption that most of those impacts after this options expiry will be as a result of the Conformité Européenne (CE) extension.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m:
Costs: Not quantified	Benefits: Not quantified	Net: Not quantified	Not quantified

Policy Background

Pressure equipment (PE) is required in many sectors of the UK economy including energy (e.g. cooling systems in power stations), healthcare (e.g. oxygen cylinders for Covid-19), food production and storage (e.g. nitrogen for food preservation), heating (e.g. heat pumps), and air conditioning systems. The pressure equipment sector is highly regulated due to its nature of the movement of gases or liquids under pressure, and therefore the potential for injury or loss of human life should there be an accident. It is subject to its own regime rather than general product safety regulations. In the UK, the Pressure Equipment (Safety) Regulations 2016 implemented Directive 2014/68/EU. The EU Withdrawal Act 2018 preserved the PE(S)R and enabled them to be amended to continue to function effectively once the UK left the EU.

Essential safety requirements are specified in legislation for pressure equipment and its manufacture to guard against accidents and fatalities. This includes the certification of materials, material manufacturers quality assurance systems, permanent joining (welding) personnel and procedures, and non-destructive testing personnel, by competent bodies. These certification requirements are unique to the manufacturing of pressure equipment.

Higher risk categories of pressure equipment cannot be placed on the UK market until they have passed independent third-party conformity assessment, demonstrating that they have met the essential safety requirements. Manufacturers wishing to place pressure equipment on the market can choose whether to have their products conformity assessed by a UK approved body and be United Kingdom Conformity Assessment (UKCA) marked, or by a European Notified Body and be Conformité Européenne (CE) marked. If a product is to be placed on the UK market with a UKCA marking, the legislation requires, except where time-limited transitional provisions apply, that the competent bodies certifying personnel and materials must be based in the UK. In place since the UK left the European Union, these requirements are causing unintentional adverse supply chain issues, and increasing costs, for manufacturers wishing to place pressure equipment on the Great Britain (GB) market.

The preferred option is to amend this legislation to change the essential safety requirements for UKCA marked equipment so that competent bodies certifying personnel and materials can be based either in the UK or the European Economic Area. This will overcome the problems caused by manufacturing processes and activities taking place in different countries, and across different trade blocs. The final destination of the end product might not be known until the final stage of production, and it may not be possible to 'retro-certificate' for the GB market personnel who have the necessary qualifications to do the job. This might also be the case for materials used in the manufacturing process, where the certificates were issued by an EEA-based competent body and not one based in the UK.

The instrument that is being laid now closes a gap that has emerged in current transitional provisions. This will allow UK approved bodies, when carrying out UKCA conformity assessment of pressure equipment, to take account of certificates issued by relevant European conformity assessment bodies for personnel and materials where: a) those certificates were issued before 31 December 2020, and the product was placed on the market after that date, or b) certificates issued before 31 December 2024, but the product is not placed on the market until after that date. Certificates for personnel issued before 31 December 2020 expire after three years. A certificate issued by an EEA-based competent body after 31 December 2020 currently cannot be used for a product being placed on the GB market in 2024, where a UK approved body is carrying out the conformity assessment for UKCA marking.

Evidence Base

Problem under consideration and rationale for intervention

The issue being addressed is a regulatory inflexibility which, for pressure equipment intended for the GB market and UKCA marking, limits access to personnel and materials that are available on global markets through the requirement for certification only by UK-based competent bodies.

The policy's objectives are to reduce costs and administrative burdens and widen the choice of personnel and materials for use in the early stages of manufacturing, for pressure equipment manufacturers wishing to place UKCA marked products on the GB market.

Without the policy, there is a risk of a long-term undersupply of labour and materials for the manufacture of UKCA marked pressure equipment intended for the GB market. This risk will depend on decisions by the UK and EU on product safety rules for pressure equipment. . In the short-term, the certification requirements could create delays to the completion of some high value projects intended for putting into service this summer (2024). This is due to the inflexible requirements for the certifying of labour and materials that are used as inputs to these supply chains. These requirements may be costly enough that manufacturers prefer to withdraw from the GB market altogether rather than incur the cost of additional certification.

The government is best placed to resolve this issue, as it is a regulatory matter under the government's control.

Rationale and evidence to justify the level of analysis used in the IA (proportionality approach)

In this analysis, it has been assumed that the bulk of the impacts last from when this policy is implemented (approx. spring 2024) up until its expiry on 31st December 2024.

Given the length of the policy's main impacts, the Department for Business and Trade (DBT) has considered the proportionality of the analysis for this statutory instrument (SI), recognising the limitations of our data and evidence, and has concluded that a broadly qualitative approach is most appropriate. An attempt at quantification was made through engaging with stakeholders, however due to the sensitive nature of the policy, many stakeholders were not comfortable sharing data, even at an aggregate level. Regardless, careful engagement with key stakeholders and assessment of the proposal's impacts have taken place to ensure all the key impacts have been considered. Indeed, it is industry who are asking for this change. The intricacies of this proposal mean that the earlier it is laid in Parliament, the larger the realised benefits will be.

Some quantification has been made, utilising data provided by the Office for National Statistics (ONS) and His Majesties Revenue & Customs (HMRC). To do this, key assumptions have been made, grouping different businesses by their Standard Industrial Classification (SIC) code to estimate how many businesses would be impacted by this proposal. Although this grouping has been done by carefully looking at the ONS description of business and activities and mapping them across to the pressure equipment sector, the data provided by ONS does not go into enough granularity about the specific products these businesses trade in. Therefore, these figures provided are only estimates, but also are likely to be overestimates, due to the overlap of business activity and therefore double counting when summing up these figures.

Description of options considered

Option 0 – Do nothing

The 'do nothing' option would see the continuation of the requirement for PE businesses intending to place UKCA marked products on the GB market to have obtained certification of personnel and materials involved in the early stages of manufacturing from UK-based bodies only.

Under the UKCA system, only competent bodies that are established in the UK can: certify personnel; certify a material manufacturer's quality-assurance system (QAS); and appraise materials. Much of the early stages of manufacturing can happen abroad where the final destination of the product is unknown at the time, and where it then becomes almost impossible to 'retro-certificate' for the GB market the personnel involved. As the GB materials market is relatively small, and competition for materials high, in global terms, there is little incentive for material manufacturers (largely based overseas) to obtain what to them (since the UK left the EU), is now additional certification.

In the short-term, manufacturers may have to delay certain projects that were due for completion this summer, until January 2025. This is due to the ending of a particular transitional provision which previously allowed the recognition of UKCA marking of European Economic Area (EEA) based body certificates for personnel and materials.

In the long term, pressure equipment manufacturers may either struggle to source the latest materials (as these inputs must be certified by UK bodies), or withdraw from the UK market altogether, at a loss to the UK economy. If the material manufacturers did seek certification from the UK certification bodies, they may pass this additional cost to UK businesses intending to trade in the GB market.

This could result in such businesses withdrawing from the GB market to avoid the burden of certification just for that market.

Option 1 – Recognition of EEA-based bodies

Option 1 involves an amendment to existing legislation that would enable pressure equipment manufacturers undertaking UKCA to include certification of inputs (including personnel qualifications, materials, and quality assurance systems) conducted by competent bodies based in the EEA.

Allowing UK manufacturers to purchase and use materials certified by EEA based bodies will result in the widest choice for manufacturers and ease supply chain issues.

This scenario enables the markets for these materials to operate smoothly, ensuring continuous supply of inputs to manufacturers and therefore uninterrupted supply of pressure equipment, preventing costly delays to projects in key UK industries (for example the energy industry).

In the longer-term, this would protect these supply chains in the case of diverging requirements between UKCA and CE certification.

Additional context – Conformité Européenne (CE) extension

The Government announced on 1 August 2023 that it intends to change the law to continue recognising the CE marking of products by EU Notified Bodies. Upon implementation, manufacturers would have access to the full materials market.

This CE recognition extension policy would operate on a longer timeframe (with implementation not expected until January 2025) and as such, the ‘do nothing’ option could result in costly delays to major projects that require certified inputs. This would have the biggest impact on project with a deadline in Summer 2024, that could experience costly delays to completion.

The instrument (option one) realigns the rules for CE and UKCA marked products intended for the GB market. There is currently little potential for divergence between the two systems in this sector on the issue of certification of personnel and materials.

Monetised and non-monetised costs and benefits of each option (including administrative burden)

For the following analysis across both options, unless stated otherwise, 2023 data has been used to conduct the analysis present in this Impact Assessment.

Option 0: Do Nothing

Under this ‘do nothing’ option, the trade and supply chain issues that the proposal aims to rectify will continue to persist, causing difficulties for manufacturers abroad and in the UK to place and trade pressure equipment products on the UK market. These difficulties will both be short-term – i.e. a potential delay to projects originally commissioned to come into service in 2024 – and in the long-term, depending on future decisions by the EU and UK Government on product safety rules in this area. An alternative option for businesses intending to place UKCA marked products on the GB market in 2024 would, in theory, be to CE mark the products. However, this would involve re-testing and re-assessing the materials, and re-certifying both the personnel and the materials used. The relevant personnel would have to be traced and be willing to undergo certification, including possibly undergoing testing and examination. Even if they could be easily traced, they would be unlikely to be willing to take time away from current work to do this for work already done. To assess the materials, the equipment would have to be taken apart, and this would compromise its safety, requiring reassessment. This alternative was therefore deemed impracticable.

Social Costs

The costs described will largely overlap with the benefits described below in option 1, whereby in the ‘do nothing’ scenario, manufacturers will face difficulties in placing pressure equipment products on the UK market due to the issues identified above. Numerous stakeholders have highlighted this point, stating it would be more beneficial for them to delay their projects and wait until the CE recognition comes into play (expected early 2025) than pay the cost of having dual certification. The costs under this option fall into the following categories:

Reduced Choice - Businesses

As a result of the 'do nothing' scenario there will be consequences for pressure equipment manufacturers which could lead to a chain reaction for different areas of the pressure equipment sector:

- Pressure Equipment manufacturers: Those intending to place UKCA marked products on the GB market are likely to have a reduced choice of materials they can buy to manufacture pressure equipment.
- UK purchasers of pressure equipment from the GB market: These businesses will have either less choice of pressure equipment if certain manufacturers withdraw from the GB market, or less certainty of pressure equipment made from the latest materials.
- UK providers of services based on pressure equipment: Will have less choice of products from the domestic market and may have to import (more expensive) products from abroad.
- UK businesses: Will have less choice/higher costs for energy, where production and storage are reliant on pressure equipment.

Lack of choice – Consumers

UK consumers will have less choice of pressure equipment for their homes, e.g. heat pumps, air conditioning, and potentially reduced services from the energy, healthcare, and food production and preservation sectors where these rely on pressure equipment (water, hydrogen, methane, oxygen, nitrogen).

Administrative Costs

Under this scenario, pressure equipment manufacturers will face additional costs to secure (in advance of any manufacturing) the relevant certification for equipment intended for the GB market and UKCA marking. As stated by some stakeholders with whom the Office for Product Safety and Standards (OPSS) has engaged, there is minimal incentive for material manufacturers (largely based abroad), to obtain certification of their quality assurance systems. As a result, UK manufacturers wishing to obtain state-of-the-art materials, would have to pay the cost themselves of the material manufacturers' UK market certification, creating an additional financial burden for these businesses. These costs can include cost of certification, inspections, and audits of documentation. There is also the possibility of these costs being passed on to consumers, leading to higher prices.

The level of these costs is dependent on the contractual arrangements for procurement and supply that they arrange with overseas suppliers, the regularity of orders, and the size and scope of individual projects. Although they cannot be quantified, or included in this IA because of commercial sensitivities, they are anticipated to be significant, with the delays in projects leading to considerable business and consumer burden.

Business Benefits – Increased Business

Based on our assessment, under the 'do nothing' scenario there are no benefits for pressure equipment manufacturers intending to place UKCA marked products on the GB market.

There may however be marginal benefits in the short-term for UK based certification bodies, who may benefit from increased business. Given businesses are required to get UKCA certification from a UK based body, those wishing to place UKCA marked pressure equipment products in the UK will be required to engage with these UK businesses, which may see them gain an increase in their revenue. However, initial engagement with stakeholders has provided limited evidence to this claim, as many conformity assessment bodies have said the UKCA side of their business is collapsing.

Since this is the 'do nothing' option, against which other options are assessed, the costs and benefits are baselined to zero in order to enable a fair comparison of the impacts other options will bring.

Option 1: Preferred Option

Size of the Market: Number of Businesses

Estimates for both the number of businesses and size of the market for those in scope of these regulations have been derived by utilising ONS SIC codes and matching the description to corresponding regulations. ONS business populations data was then used to estimate the number of UK manufacturers in scope of this proposal, and the turnover of the market for 2023.

For this exercise, the analysis focused on the following directive¹:

- Pressure Equipment

Table 1: Estimated business populations for Pressure Equipment 2023

Directive	No. of businesses
Pressure Equipment	5,715

Size of the Market: Turnover

Business turnover is the complete sum of sales made over a given period. ONS data has also been used to estimate the total turnover these businesses generated, which has then been used as a proxy for the market revenue and size of this sector. Utilising 2023 ONS business populations data, it is estimated that the market turnover for businesses that trade Pressure Equipment was over £24 billion².

Financial Costs

Familiarisation costs: UK pressure equipment manufacturers intending to place UKCA marked pressure equipment on the GB market will need to familiarise themselves with the new regulation. The policy will look to allow the recognition of personnel and material certification by bodies based either in the UK or in the EEA. Therefore, these manufacturers will need to dedicate time familiarising themselves with the change in regulations before and deciding whether they would like to change how they operate. This takes the form of managers within businesses taking time to read about the changes, creating an opportunity cost from their time.

Table 1 estimates that there are over 5,700 relevant manufacturers in scope of this policy. Using guidance from the Green Book, the estimated total cost for familiarisation for all relevant pressure equipment manufacturers will range from £24,600 to £37,000, with a central estimate of £30,800. Figure 1 shows these calculations.

¹ For full list of relevant sic codes please see appendix

² Please note that this is an estimate that was calculated utilising turnover bands provided by ONS. To see the full calculations, please refer to table 6 in the appendix.

Figure 1: Option 1 Familiarisation Cost Calculation

Familiarisation costs to businesses in scope occurring in year 1

- A. Number of businesses in scope: 5,715
x
B. Average time taken to read and understand legislation in hours*: 0.13 -
0.20 (central est. 0.17)
8 – 12 minutes (central est. 10 minutes)
x
C. Average hourly wage for a corporate manager or director: £26.52**
x
D. Non-wage labour cost uplift: (1 + 22%***)

A x B x C x D = £24.6k - £37.0k

Central estimate: £30.8k

(2023 prices)

Note: Calculations presented may not equal precisely due to rounding but the underlying calculations are based on unrounded inputs.

**It is expected that the policy document will be 4 pages, consisting of between 400-600 words per page, with 500 words being our central scenario. Based on government guidance, a reading speed of 200 words per minute has been used, resulting in an estimation of between 8 and 12 minutes for businesses to read the new legislation.*

***Table 2, 2023 data*

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation2digitsocashetable2>

**** From RPC guidance <https://www.gov.uk/government/publications/rpc-short-guidance-note-implementation-costs-august-2019>*

Social Costs

Loss of Business

The other major cost that is anticipated for UK businesses is the loss of business. By allowing competent bodies in the EEA to certify pressure equipment products, there is a risk that UK equivalent bodies will lose out on this business. Stakeholders have highlighted the lack of incentive of UKCA certification, stating that the CE certification is sufficient to conduct their business and classifying the UK market for pressure equipment as 'too small'.

Despite this, based on evidence from some stakeholders, it is expected that the resulting loss of business will be small, as manufacturers were already unlikely to seek UK certification as they believed the GB market to be 'too small'. Regardless, there is an expectation for UK certification bodies to face some loss of business because of this proposal. An estimate of the scale of this impact is not available based on lack of data regarding total turnover of UK certification bodies and expected loss.

Benefits

Cost saving

For option 1, the majority of the benefits reaped will be costs saved, as without the introduction of the proposal, pressure equipment manufacturers will face significant burdens and costs. These are broken down into two different types:

Removal of delays

A major short-term benefit of this proposal is the removal of delays, which are currently causing significant costs. With this proposal, pressure equipment intended for UKCA marking and placing on the GB market this summer will be able to be placed on the market without delay – allowing them to be used in key projects. Based on anecdotal evidence from some stakeholders, a delay to a project could cause businesses up to £1m a day in costs. Large projects are also at risk of being put on pause due to the inability to put into service pressure equipment intended for UKCA marking but reliant on EEA-based body issued certificates for personnel and materials. This would also lead to increased costs for consumers, where such pressure equipment is required for sectors such as nuclear and hydrogen energy, medical equipment, heating, agriculture, and food storage.

Access to latest materials

A longer-term benefit of this proposal is the increase in state-of-the-art materials available to UK pressure equipment manufacturers. By allowing equal recognition of both UK-based body and EEA based body certificates for personnel and materials, UK- based pressure equipment manufacturers can gain access to the latest materials, and will not have to pay for overseas material manufacturers to obtain relevant certification. The overall cost is difficult to assess, as the level of these costs are dependent on the contractual arrangements for procurement and supply that they arrange with overseas suppliers, the regularity of orders, and the size and scope of individual projects. Businesses will also benefit from the maintaining of relationships with overseas suppliers.

Direct costs and benefits to business calculations

A lack of quantified evidence makes performing an Equivalent Annual Net Direct Cost to Business (EANDCB) calculation impossible. However, Option 1 presents a number of benefits that businesses will directly benefit from (relative to Option 0: Do Nothing). This would mean the Net Cost to Businesses would be negative; and therefore, if an EANDCB calculation was possible the figure is likely to be significantly negative.

Risks and assumptions

The key assumptions for quantifying the impacts of this proposal are:

- The majority of the benefits of this proposal will mostly only be reaped during the duration of when it is implemented until the end of 2024, whereby then the CE extension will kick in and most of the benefits from that point onwards will be the result of that legislation. This analysis assumes the CE extension gets implemented and is therefore included in the counterfactual. The long-term benefits (post CE extension in 2025) have therefore been largely considered as separate to this pressure equipment proposal, to avoid double counting.
- Familiarisation costs: The figures provided here are only estimates, with the true number of businesses not currently being known. The number of words per page expected is also uncertain. To mitigate this however, a low to high range has been used, with a central estimate provided to indicate our most robust estimate. The assumptions used have not undergone further evaluation.
- Trade data: A mapping exercise based on commodity classification was undertaken to map across to pressure equipment. Although this analysis engaged experts in this regulatory area in this exercise, the detail provided on these products classification is limited, meaning the figures provided are only estimates. To counteract this, trade statistics are rounded to avoid spurious accuracy.
- Business reaction to the change in legislation: It is anticipated that this proposal will see an increase in pressure equipment being placed on the UK, however the magnitude of this impact has not been quantified.

- Scale of Impact: Stakeholder engagement identified the risk of not taking action but due to the commercial sensitivity, the scale of impact has not been possible to quantify. There is a risk that the cost of additional certification is lower than implied from this engagement. In this case, the effect of the policy may be more limited as the trade barrier would be less significant even in the counterfactual scenario.

Impact on small and micro businesses

Table 1 estimates that there are over 5,700 businesses that manufacture pressure equipment in the UK in 2023. Breaking these down by business size, most of these businesses (over 88%) are micro or small (less than 50 employees) businesses, with only a minority (1.7%) classed as a large business (over 250 employees). Table 2 has a full breakdown. There is limited information on the extent to which this could disproportionately impact small and micro businesses relative to large businesses.

This instrument benefits all sizes of business that manufacture pressure equipment intended for UKCA marking and placing on the GB market. To exclude SMEs would place them at a disadvantage in relation to larger businesses and would be perverse.

There is a possibility that larger businesses may benefit more from this proposal, as Option 1 will open up trade barriers and increase business with international suppliers, benefiting those with pre-existing deals with international manufacturers. This may be less likely for smaller businesses, who may not have as much international reach when trading these products. Furthermore, costs such as familiarisation costs which are incurred by all businesses will represent a bigger relative burden to smaller businesses than larger ones.

Table 2: Pressure Equipment number of businesses by size (2023)³

Directive	Micro	Small	Medium	Large
Pressure Equipment	3,680	1,385	560	100

Wider impacts

Environmental Impacts

The nature of this proposal means that the environmental impacts are expected to be minimal. The objective of Option 1 is to ease costs and burdens on businesses who manufacture pressure equipment, as it will become easier for these businesses to place these products on the GB market. This proposal is not expected to change the way pressure equipment businesses conduct their manufacturing processes, their disposal of waste, or their usage of land. Some anecdotal evidence suggests that the proposal could lead to minor benefits on the environment, with the easing of trade frictions encouraging the placing of greener energy products on the market. On the other hand, there may be small increases in pollution due to the increase in trade, with more products being transported as a result of the opening of the trade barriers.

Public Sector Equality Duty (PSED)

Our analytical assessment has found no supporting evidence or indication that those with protected characteristics will be impacted differently or unfairly than those without. There is no evidence found to suggest that different groups of protected characteristics have different needs to others specifically in connection with the manufacture or import of pressure equipment on to the Great Britain market.

The policy objective is to reduce costs and administrative burdens for all manufacturers wishing to place pressure equipment on the Great Britain market, thus benefitting the UK economy as a whole.

³ Total number of businesses differ slightly when measured by business size due to different methodology conducted by ONS.

Table 3: Proposal expected impact of Protected Characteristics

Protected Characteristic	Expected Impact
Disability	None
Race	None
Age	None
Gender reassignment	None
Religion or belief	None
Pregnancy & Maternity	None
Sexual orientation	None
Sex	None

Cost to Government

There are no material additional costs for Government expected under Option 1 relative to Option 0: Do Nothing. Current costs to Government, will remain post SI implementation. These costs to Government include ensuring businesses and Conformity Assessment Bodies (CABs) are complying with the product safety regulations (the CE or UKCA marking), to ensure the safety of products on the GB market. There are also Government costs to enforcing the product safety regulations, though these are incurred under both Options.

Impact on Consumers

UK consumers are expected to benefit from the increased choice and quicker availability of materials for pressure equipment manufacturers intending to place UKCA marked equipment on the GB market in Option 1 compared to Option 0. Engagement with stakeholders have highlighted that under option 0 there is significant risk of delays of key projects that are used in crucial sectors such as renewable energy and medicine, which could harm those consumers who are reliant on these products. Consumers could also benefit indirectly from the lower prices that occur in Option 1 compared to Option 0 due to business savings being passed onto consumers in the form of lower prices. Data on these impacts however are limited and have not been quantified.

Innovation

Allowing certification of materials (and personnel) by a wider pool of bodies is likely to give businesses that manufacture pressure equipment intended for UKCA marking and placing on the GB market greater access to the latest materials, thereby making them more competitive, allowing them to innovate, and to attract more investment.

A summary of the potential trade implications

Utilising trade data provided by HMRC, we have been able to estimate the value of imports for Pressure Equipment in the last 5 years. A similar mapping exercise that was undertaken for familiarisation costs was conducted for this trade data, whereby different product commodity codes (at CN8 level) were mapped across to different regulations, and those that fell under the scope of pressure equipment were used. As was the case prior, it is important to note these figures are also estimates.

Table 4: UK Pressure Equipment trade data (rounded to 3 significant figures):

Year	Imports	Exports	Net (Exports – Imports)
2018	£3.48bn	£2.86bn	-£0.62bn
2019	£3.26bn	£3.04bn	-£0.22bn
2020	£2.72bn	£2.58bn	-£0.14bn
2021	£2.99bn	£2.80bn	-£0.19bn
2022	£3.90bn	£3.20bn	-£0.70bn
Total	£16.3bn	£14.5bn	-£1.87bn

As demonstrated in the table above, the UK has regularly been a net importer of pressure equipment over the past 5 years, and this deficit has been steadily increasing, with there being a large jump from 2021 to 2022. Over the past 5 years, this trade value deficit has accumulated to almost £2bn. The UK in particular is reliant on the EU for pressure equipment products, with it being by far the biggest importer during this time period (just under 60% of import value was from the EU).

Table 5: Full list of UK Import Partners from Pressure Equipment (2018-2022)

Region	Import value	As a %
European Union	£9.65bn	59.0%
Asia and Oceania	£2.83bn	17.3%
North America	£2.0bn	12.2%
Western Europe exc EU	£1.47bn	9.0%
Middle East and N Africa	£0.3bn	1.8%
Eastern Europe exc EU	£0.044bn	0.3%
Latin America and Caribbean	£0.036bn	0.2%
Sub-Saharan Africa	£0.027bn	0.2%

Monitoring and Evaluation

The Department for Business and Trade will look to maintain and grow its evidence base for the market for Pressure Equipment and continue to engage with the businesses, manufacturers, and market surveillance authorities in scope of the proposal. Engagement will focus on both the short and long term impacts of the proposal, looking at to what extent businesses have considered this proposal a success in reducing their costs and burdens.

The main impacts of this proposal are expected to be a reduction in trade frictions and costs for businesses, so the stakeholder engagement will focus on these two aspects, focusing on whether it has helped remove the trade barriers. Some examples of stakeholder engagement that may be conducted include stakeholder surveys and roundtables, whereby these businesses will be given the opportunity to reflect back on their experience of adapting to the new regulations, with there being a focus on providing evidence to corroborate their experience. The Department for Business and Trade may also conduct case study assessments, seeking to understand what impact this proposal has had on ease of placing products on the UK pressure equipment market.

The Department for Business and Trade will also monitor both internal and external data sources to measure the impact and effectiveness of the proposal, including relevant trade and business data provided by ONS and HMRC, some of which have already been described in this impact assessment. The focus of the metrics will be on the trade of Pressure Equipment products, with a key aim of the proposal being to reduce the current blockers of importing these products; and on the size and growth of the market, with the proposal aiming to restore and encourage the commission of new large-scale key projects which require the use of Pressure Equipment.

The methods of data collection, monitoring and evaluation, as well as stakeholder engagement described above will contribute to judging the success of the policy.

Post Implementation Review

According to the Retained EU Law (Revocation and Reform) Act 2023 – see s. 20(5), there is no requirement for a post implementation review for this regulation. Although this does not prevent the review and improvement of this legislation, it removes the requirements relating to this proposal.

Appendix

Table 6: Full calculation for estimated turnover for Pressure Equipment manufacturers

Turnover Size Band (£000s) - [Midpoint used for analysis in square brackets] by Business SIC Code										
	0-49 [24.5]	50-99 [74.5]	100-249 [174.5]	250-499 [374.5]	500-999 [749.5]	1000-1999 [1499.5]	2000-4999 [3499.5]	5000-9999 [7499.5]	10000-49999 [29999.5]	50000+ [50,000]
2221: Manufacture of plastic plates; sheets; tubes and profiles, Turnover Total: £4.06bn										
Businesses	25	20	45	40	35	65	75	40	70	25
Turnover	£612.5k	£1,490k	£7,852.5k	£14,980k	£26,232.5k	£97,467.5k	£262,462.5k	£299,980k	£2,099,965k	£1,250,000k
2420: Manufacture of tubes; pipes; hollow profiles and related fittings; of steel, Turnover Total: £1.05bn										
Businesses	35	30	75	35	40	40	35	15	15	5
Turnover	£857.5k	£2,235k	£13,087.5k	£13,107.5k	£29,980k	£59,980k	£122,482.5k	£112,492.5k	£449,992.5k	£250,000k
2451: Casting of iron, Turnover Total: £363m										
Businesses	5	10	20	10	10	5	15	5	0	5
Turnover	£122.5k	£745k	£3,490k	£3,745k	£7,495k	£7,497.5k	£52,492.5k	£37,497.5k	£0k	£250,000k
2452: Casting of steel, Turnover Total: £240.9m										
Businesses	5	10	15	10	5	5	10	5	5	0
Turnover	£122.5k	£745k	£2,617.5k	£3,745k	£3,747.5k	£7,497.5k	£34,995k	£37,497.5k	£149,997.5k	£0k
2521: Manufacture of central heating radiators and boilers, Turnover Total £351.6m										
Businesses	10	30	45	10	10	5	10	5	0	5
Turnover	£245k	£2,235k	£7,852.5k	£3,745k	£7,495k	£7,497.5k	£34,995k	£37,497.5k	£0k	£250,000k
2529: Manufacture of other tanks; reservoirs and containers of metal, Turnover Total: £877.6m										
Businesses	5	10	10	10	15	15	25	20	20	0
Turnover	£122.5k	£745k	£1,745k	£3,745k	£11,242.5k	£22,492.5k	£87,487.5k	£149,990k	£599,990k	£0k
2530: Manufacture of steam generators; except central heating hot water boilers, Turnover Total: £250.5m										
Businesses	15	10	25	10	5	10	10	5	5	0
Turnover	£367.5k	£745k	£4,362.5k	£3,745k	£3,747.5k	£14,995k	£34,995k	£37,497.5k	£149,997.5k	£0k
2651: Manufacture of instruments and appliances for measuring; testing and navigation, Turnover Total: £7.64bn										
Businesses	260	235	295	190	190	200	230	100	125	35

Turnover	£6,370k	£17,507.5k	£51,477.5k	£71,155k	£142,405k	£299,900k	£804,885k	£749,950k	£3,749,937.5k	£1,750,000k
2812: Manufacture of fluid power equipment, Turnover Total: £926.9m										
Businesses	10	10	20	20	20	25	25	10	15	5
Turnover	£245k	£745k	£3,490k	£7,490k	£14,990k	£37,487.5k	£87,487.5k	£74,995k	£449,992.5k	£250,000k
2813: Manufacture of other pumps and compressors, Turnover Total: £1.63bn										
Businesses	30	20	40	30	35	30	40	20	25	10
Turnover	£735k	£1,490k	£6,980k	£11,235k	£26,232.5k	£44,985k	£139,980k	£149,990k	£749,987.5	£500,000k
2814: Manufacture of other taps and valves, Turnover Total: £1.05bn										
Businesses	15	10	15	20	10	15	35	25	15	5
Turnover	£367.5k	£745k	£2,617.5k	£7,490k	£7,495k	£22,492.5k	£122,482.5k	£187,487.5k	£449,992.5k	£250,000k
2825: Manufacture of non-domestic cooling and ventilation equipment, Turnover Total: £2.48bn										
Businesses	75	135	135	90	110	75	80	45	45	5
Turnover	£1,837.5k	£10,057.5k	£23,557.5k	£33,705k	£82,445k	£112,462.5k	£279,960k	£337,477.5k	£1,349,977.5k	£250,000k
2829: Manufacture of other general-purpose machinery n.e.c., Turnover Total: £3.83bn										
Businesses	155	105	230	155	140	120	135	75	55	15
Turnover	£3,797.5k	£7,822.5k	£40,135k	£58,047.5k	£104,930k	£179,940k	£472,432.5k	£562,462.5k	£1,649,972.5k	£750,000k
TOTAL of All SIC Codes above: £24.76bn										

ONS provides turnover data for each business in its database in bands, as shown in the table above (e.g., 0-49,000). To estimate the annual turnover for that business population (for example, '2229: Manufacture of other general purpose machinery n.e.c'), the midpoint of the turnover band is used and multiplied by the number of businesses within that band. For example, the table shows that there are 155 businesses in the manufacture of other general-purpose machinery SIC code that have a turnover of £0-£49,000, so as we do not know the individual turnover for each business, the 155 businesses are assumed to have the mid-point of £24,500 turnover to create the total of £3,797,500. This exercise is repeated for each turnover band, except the last one (£50,000k+) as it isn't a 'band' and instead the £50,000k is assumed as the 'midpoint' and the same calculation as previous is done. Then, these turnover figures across the bands are summed up (see final column) to estimate the turnover for that SIC code. Finally, these figures are then totalled to estimate the total turnover for businesses under the directive of 'Pressure Equipment', which is how the £24.76bn estimate figure is derived.

List of SIC codes used for relevant directive

For the analysis presented in this IA, we have utilised ONS SIC code business population data to estimate both the number of businesses in scope of the proposal, and also the size of the market. This was done by matching these SIC codes to the 'Pressure Equipment' directive. The full list of SIC codes are below.

Table 7: Pressure Equipment SIC codes:

SIC Code	Description	Directive
2221	Manufacture of plastic plates; sheets; tubes and profiles	Pressure Equipment
2420	Manufacture of tubes; pipes; hollow profiles and related fittings; of steel	Pressure Equipment
2451	Casting of Iron	Pressure Equipment
2452	Casting of steel	Pressure Equipment
2521	Manufacture of central heating radiators and boilers	Pressure Equipment
2530	Manufacture of steam generators; reservoirs and containers of metal	Pressure Equipment
2651	Manufacture of instruments and appliances for measuring; testing and navigation	Pressure Equipment
2812	Manufacture of fluid power equipment	Pressure Equipment
2813	Manufacture of other pumps and compressors	Pressure Equipment
2825	Manufacture of non-domestic cooling and ventilation equipment	Pressure Equipment
2829	Manufacture of other general-purpose machinery n.e.c	Pressure Equipment
2814	Manufacture of other taps and valves	Pressure Equipment
2529	Manufacture of other tanks; reservoirs and containers of metal	Pressure Equipment

List of CN8 codes used for relevant directive

HMRC data was also utilised to provide estimates for trade data for pressure equipment. This was done by matching these CN8 codes to the 'Pressure Equipment' regulation. The full list of CN8 codes and their descriptions are below.

Table 8: Pressure Equipment CN8 codes:

CN8	Description
39173200	FLEXIBLE TUBES, PIPES AND HOSES OF PLASTICS, NOT REINFORCED OR OTHERWISE COMBINED WITH OTHER MATERIALS, WITHOUT FITTINGS
73043120	PRECISION TUBES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF IRON OR NON-ALLOY STEEL, COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED" (EXCL. LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES OR CASING AND TUBING OF A KIND USED FOR DRILLING FOR OIL OR GAS)
73043180	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF IRON OR NON-ALLOY STEEL, COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED" (EXCL. CAST IRON PRODUCTS, LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING AND TUBING OF A KIND USED FOR DRILLING FOR OIL OR GAS AND PRECISION TUBES)
73043910	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF IRON OR NON-ALLOY STEEL, NOT COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", UNWORKED, STRAIGHT AND OF UNIFORM WALL-THICKNESS, FOR USE SOLELY IN THE MANUFACTURE OF TUBES AND PIPES WITH OTHER CROSS-SECTIONS AND WALL-THICKNESSES (EXCL. CAST IRON PRODUCTS)
73043952	THREADED OR THREADABLE TUBES "GAS PIPE", SEAMLESS, OF IRON OR NON-ALLOY STEEL, PLATED OR COATED WITH ZINC (EXCL. CAST IRON PRODUCTS)
73043958	THREADED OR THREADABLE TUBES "GAS PIPE", SEAMLESS, OF IRON OR NON-ALLOY STEEL (EXCL. CAST IRON PRODUCTS AND PRODUCTS PLATED OR COATED WITH ZINC)
73043992	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF IRON OR NON-ALLOY STEEL, NOT COLD-DRAWN OR COLD-ROLLED (COLD-REDUCED), OF AN EXTERNAL DIAMETER OF ≤ 168,3 MM (EXCL. CAST IRON PRODUCTS, LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING, TUBING AND DRILL PIPE OF A KIND USED IN DRILLING FOR OIL OR GAS AND TUBES, PIPES AND HOLLOW PROFILES OF SUBHEADINGS 7304 39 10 TO 7304 39 58)
73043993	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF IRON OR NON-ALLOY STEEL, NOT COLD-DRAWN OR COLD-ROLLED (COLD-REDUCED), OF AN EXTERNAL DIAMETER OF > 168,3 MM BUT ≤ 406,4 MM (EXCL. CAST IRON PRODUCTS, LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING, TUBING AND DRILL PIPE OF A KIND USED FOR DRILLING FOR OIL OR GAS AND TUBES, PIPES AND HOLLOW PROFILES OF SUBHEADINGS 7304 39 10 TO 7304 39 58)
73043998	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF IRON OR NON-ALLOY STEEL, NOT COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", OF AN EXTERNAL DIAMETER OF > 406,4 MM (EXCL. CAST IRON PRODUCTS, LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING AND TUBING OF A KIND USED FOR DRILLING FOR OIL OR GAS AND TUBES, PIPES AND HOLLOW PROFILES OF HEADING 7304.39.52 AND 7304.39.58)
73044100	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF STAINLESS STEEL, COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED" (EXCL. LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING AND TUBING OF A KIND USED FOR DRILLING FOR OIL OR GAS)

CN8	Description
73044910	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF STAINLESS STEEL, NOT COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", UNWORKED, STRAIGHT AND OF UNIFORM WALL-THICKNESS, FOR USE SOLELY IN THE MANUFACTURE OF TUBES AND PIPES WITH OTHER CROSS-SECTIONS AND WALL-THICKNESSES
73044993	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF STAINLESS STEEL, NOT COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", OF AN EXTERNAL DIAMETER OF $\leq 168,3\text{MM}$ (EXCL. LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING AND TUBING OF A KIND USED FOR DRILLING FOR OIL OR GAS AND TUBES, PIPES AND HOLLOW PROFILES OF HEADING 7304.49.10)
73044995	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF STAINLESS STEEL, NOT COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", OF AN EXTERNAL DIAMETER OF $> 168,3\text{MM}$ BUT $\leq 406,4\text{MM}$ (EXCL. LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING AND TUBING OF A KIND USED FOR DRILLING FOR OIL OR GAS AND TUBES, PIPES AND HOLLOW PROFILES OF HEADING 7304.49.10)
73044999	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF STAINLESS STEEL, NOT COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", OF AN EXTERNAL DIAMETER OF $> 406,4\text{MM}$ (EXCL. LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING AND TUBING OF A KIND USED FOR DRILLING FOR OIL OR GAS AND TUBES, PIPES AND HOLLOW PROFILES OF HEADING 7304.49.10)
73045112	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF ALLOY STEEL OTHER THAN STAINLESS, COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", STRAIGHT AND OF UNIFORM WALL-THICKNESS, CONTAINING BY WEIGHT $>= 0,9\%$ BUT $\leq 1,15\%$ CARBON AND $>= 0,5\%$ BUT $\leq 2\%$ CHROME, WHETHER OR NOT CONTAINING BY WEIGHT $\leq 0,5\%$ MOL YBDENUM, OF A LENGTH OF $\leq 0,5\text{M}$ (EXCL. TUBES, PIPES AND HOLLOW PROFILES OF SUBHEADINGS 7304 19 TO 7304 29)
73045118	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF ALLOY STEEL OTHER THAN STAINLESS, COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", STRAIGHT AND OF UNIFORM WALL-THICKNESS, CONTAINING BY WEIGHT $>= 0,9\%$ BUT $\leq 1,15\%$ CARBON AND $>= 0,5\%$ BUT $\leq 2\%$ CHROME, WHETHER OR NOT CONTAINING BY WEIGHT $\leq 0,5\%$ MOL YBDENUM, OF A LENGTH OF $> 0,5\text{M}$ (EXCL. TUBES, PIPES AND HOLLOW PROFILES OF SUBHEADINGS 7304 19 TO 7304 29)
73045181	PRECISION TUBES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF ALLOY STEEL OTHER THAN STAINLESS, COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED" (EXCL. LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING AND TUBING OF A KIND USED FOR DRILLING FOR OIL AND TUBES, AND PIPES AND HOLLOW PROFILES, STRAIGHT AND OF UNIFORM WALL-THICKNESS, CONTAINING BY WEIGHT $>= 0,9\%$ BUT $\leq 1,15\%$ CARBON AND $>= 0,5\%$ BUT $\leq 2\%$ CHROME, WHETHER OR NOT CONTAINING BY WEIGHT $\leq 0,5\%$ MOL YBDENUM)

CN8	Description
73045189	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF ALLOY STEEL OTHER THAN STAINLESS, NOT COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED" (EXCL. LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING AND TUBING OF A KIND USED FOR DRILLING FOR OIL, PRECISION TUBES, AND, PIPES AND HOLLOW PROFILES, STRAIGHT AND OF UNIFORM WALL-THICKNESS, CONTAINING BY WEIGHT $\geq 0,9\%$ BUT $\leq 1,15\%$ CARBON AND $\geq 0,5\%$ BUT $\leq 2\%$ CHROME, WHETHER OR NOT CONTAINING BY WEIGHT $\leq 0,5\%$ MOLYBDENUM)
73045910	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF ALLOY STEEL OTHER THAN STAINLESS, NOT COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", UNWORKED, STRAIGHT AND OF UNIFORM WALL-THICKNESS, FOR USE SOLELY IN THE MANUFACTURE OF TUBES AND PIPES WITH OTHER CROSS-SECTIONS AND WALL-THICKNESSES
73045932	TUBES, PIPES AND HOLLOW PROFILES OF ALLOY STEEL (EXCL. STAINLESS), SEAMLESS, OF CIRCULAR CROSS-SECTION (NOT COLD-DRAWN OR COLD-ROLLED), STRAIGHT AND OF UNIFORM WALL-THICKNESS, OF A LENGTH $\leq 0,5$ M, CONTAINING BY WEIGHT $\geq 0,9\%$ BUT $\leq 1,15\%$ CARBON AND $\geq 0,5\%$ BUT $\leq 2\%$ CHROME, WHETHER OR NOT CONTAINING BY WEIGHT $\leq 0,5\%$ MOLYBDENUM (EXCL. TUBES, PIPES AND HOLLOW PROFILES OF SUBHEADINGS 7304 19 TO 7304 29 AND 7304 59 10)
73045938	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF ALLOY STEEL (EXCL. STAINLESS) (NOT COLD-DRAWN OR COLD-ROLLED) STRAIGHT AND OF UNIFORM WALL-THICKNESS, CONTAINING BY WEIGHT $\geq 0,9\%$ BUT $\leq 1,15\%$ CARBON AND $\geq 0,5\%$ BUT $\leq 2\%$ CHROME, WHETHER OR NOT CONTAINING BY WEIGHT $\leq 0,5\%$ MOLYBDENUM, OF A LENGTH OF $> 0,5$ M (EXCL. TUBES, PIPES AND HOLLOW PROFILES OF SUBHEADINGS 7304 19 TO 7304 29 AND 7304 59 10)
73045992	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF ALLOY STEEL OTHER THAN STAINLESS, NOT COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", OF AN EXTERNAL DIAMETER OF $\leq 168,3$ MM (EXCL. LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING AND TUBING OF A KIND USED FOR DRILLING FOR OIL OR GAS AND TUBES, PIPES AND HOLLOW PROFILES OF HEADING 7304.59.10 TO 7304.59.38)
73045993	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF ALLOY STEEL OTHER THAN STAINLESS, NOT COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", OF AN EXTERNAL DIAMETER OF $> 168,3$ MM BUT $\leq 406,4$ MM (EXCL. LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING AND TUBING OF A KIND USED FOR DRILLING FOR OIL OR GAS AND TUBES, PIPES AND HOLLOW PROFILES OF HEADING 7304.59.10 TO 7304.59.38)
73045999	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF CIRCULAR CROSS-SECTION, OF ALLOY STEEL OTHER THAN STAINLESS, NOT COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", OF AN EXTERNAL DIAMETER OF $> 406,4$ MM (EXCL. LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING AND TUBING OF A KIND USED FOR DRILLING FOR OIL OR GAS AND TUBES, PIPES AND HOLLOW PROFILES OF HEADING 7304.59.10 TO 7304.59.38)
73049000	TUBES, PIPES AND HOLLOW PROFILES, SEAMLESS, OF NON-CIRCULAR CROSS-SECTION, OF IRON OR STEEL (EXCL. PRODUCTS OF CAST IRON)

CN8	Description
73053100	TUBES AND PIPES HAVING CIRCULAR CROSS-SECTIONS AND AN EXTERNAL DIAMETER OF > 406,4 MM, OF IRON OR STEEL, LONGITUDINALLY WELDED (EXCL. PRODUCTS OF A KIND USED FOR OIL OR GAS PIPELINES OR OF A KIND USED IN DRILLING FOR OIL OR GAS)
73053900	TUBES AND PIPES HAVING CIRCULAR CROSS-SECTIONS AND AN EXTERNAL DIAMETER OF > 406,4 MM, OF IRON OR STEEL, WELDED (EXCL. PRODUCTS LONGITUDINALLY WELDED OR OF A KIND USED FOR OIL OR GAS PIPELINES OR OF A KIND USED IN DRILLING FOR OIL OR GAS)
73059000	TUBES AND PIPES HAVING CIRCULAR CROSS-SECTIONS AND AN EXTERNAL DIAMETER OF > 406,4 MM, OF FLAT-ROLLED PRODUCTS OF IRON OR STEEL, WELDED (EXCL. WELDED PRODUCTS OR PRODUCTS OF A KIND USED FOR OIL OR GAS PIPELINES OR OF A KIND USED IN DRILLING FOR OIL OR GAS)
73063011	PRECISION TUBES, WELDED, OF CIRCULAR CROSS-SECTION, OF IRON OR NON-ALLOY STEEL, WITH A WALL THICKNESS OF ≤ 2 MM
73063019	PRECISION TUBES, WELDED, OF CIRCULAR CROSS-SECTION, OF IRON OR NON-ALLOY STEEL, WITH A WALL THICKNESS OF > 2 MM
73063041	THREADED OR THREADABLE TUBES "GAS PIPE"; WELDED, OF CIRCULAR CROSS-SECTION, OF IRON OR NON-ALLOY STEEL, PLATED OR COATED WITH ZINC
73063049	THREADED OR THREADABLE TUBES "GAS PIPE"; WELDED, OF CIRCULAR CROSS-SECTION, OF IRON OR NON-ALLOY STEEL (EXCL. PRODUCTS PLATED OR COATED WITH ZINC)
73063072	OTHER TUBES, PIPES AND HOLLOW PROFILES, WELDED, OF CIRCULAR CROSS-SECTION, OF IRON OR NON-ALLOY STEEL, OF AN EXTERNAL DIAMETER OF $\leq 168,3$ MM, PLATED OR COATED WITH ZINC (EXCL. LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES OR CASING AND TUBING OF A KIND USED IN DRILLING FOR OIL OR GAS)
73063077	OTHER TUBES, PIPES AND HOLLOW PROFILES, WELDED, OF CIRCULAR CROSS-SECTION, OF IRON OR NON-ALLOY STEEL OF AN EXTERNAL DIAMETER OF $\leq 168,3$ MM (EXCL. PLATED OR COATED WITH ZINC AND LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES, CASING AND TUBING OF A KIND USED IN DRILLING FOR OIL OR GAS, PRECISION TUBES AND THREADED OR THREADABLE TUBES "GAS PIPE")
73063080	TUBES, PIPES AND HOLLOW PROFILES, WELDED, HAVING A CIRCULAR CROSS-SECTION, OF IRON OR STEEL, OF AN EXTERNAL DIAMETER OF $> 168,3$ MM BUT $\leq 406,4$ MM (EXCL. LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES OR CASING AND TUBING OF A KIND USED IN DRILLING FOR OIL OR GAS, OR PRECISION STEEL TUBES, ELECTRICAL CONDUIT TUBES OR THREADED OR THREADABLE TUBES "GAS PIPE")
73064020	TUBES, PIPES AND HOLLOW PROFILES, WELDED, OF CIRCULAR CROSS-SECTION, OF STAINLESS STEEL, COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED" (EXCL. PRODUCTS HAVING INTERNAL AND EXTERNAL CIRCULAR CROSS-SECTIONS AND AN EXTERNAL DIAMETER OF $> 406,4$ MM, AND LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES OR CASING AND TUBING OF A KIND USED IN DRILLING FOR OIL OR GAS)

CN8	Description
73064080	TUBES, PIPES AND HOLLOW PROFILES, WELDED, OF CIRCULAR CROSS-SECTION, OF STAINLESS STEEL (EXCL. PRODUCTS COLD-DRAWN OR COLD-ROLLED "COLD-REDUCED", TUBES AND PIPES HAVING INTERNAL AND EXTERNAL CIRCULAR CROSS-SECTIONS AND AN EXTERNAL DIAMETER OF > 406,4 MM, AND LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES OR CASING AND TUBING OF A KIND USED IN DRILLING FOR OIL OR GAS)
73065020	PRECISION STEEL TUBES, WELDED, OF CIRCULAR CROSS-SECTION, OF ALLOY STEEL OTHER THAN STAINLESS
73065080	TUBES, PIPES AND HOLLOW PROFILES, WELDED, OF CIRCULAR CROSS-SECTION, OF ALLOY STEEL OTHER THAN STAINLESS (EXCL. TUBES AND PIPES HAVING INTERNAL AND EXTERNAL CIRCULAR CROSS-SECTIONS AND AN EXTERNAL DIAMETER OF > 406,4 MM, AND LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES OR CASING AND TUBING OF A KIND USED IN DRILLING FOR OIL OR GAS, AND PRECISION STEEL TUBES)
73066110	TUBES AND PIPES AND HOLLOW PROFILES, WELDED, OF SQUARE OR RECTANGULAR CROSS-SECTION, OF STAINLESS STEEL
73066192	TUBES AND PIPES AND HOLLOW PROFILES, WELDED, OF SQUARE OR RECTANGULAR CROSS-SECTION, OF IRON OR STEEL OTHER THAN STAINLESS STEEL, WITH A WALL THICKNESS OF ≤ 2 MM
73066199	TUBES AND PIPES AND HOLLOW PROFILES, WELDED, OF SQUARE OR RECTANGULAR CROSS-SECTION, OF IRON OR STEEL OTHER THAN STAINLESS STEEL, WITH A WALL THICKNESS OF > 2 MM
73066910	TUBES, PIPES AND HOLLOW PROFILES, WELDED, OF NON-CIRCULAR CROSS-SECTION, OF STAINLESS STEEL (EXCL. TUBES AND PIPES HAVING INTERNAL AND EXTERNAL CIRCULAR CROSS-SECTIONS AND AN EXTERNAL DIAMETER OF $> 406,4$ MM, LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES OR CASING AND TUBING OF A KIND USED IN DRILLING FOR OIL OR GAS, AND TUBES AND PIPES AND HOLLOW PROFILES OF SQUARE OR RECTANGULAR CROSS-SECTION)
73066990	TUBES, PIPES AND HOLLOW PROFILES, WELDED, OF NON-CIRCULAR CROSS-SECTION, OF IRON OR STEEL OTHER THAN STAINLESS STEEL (EXCL. TUBES AND PIPES HAVING INTERNAL AND EXTERNAL CIRCULAR CROSS-SECTIONS AND AN EXTERNAL DIAMETER OF $> 406,4$ MM, LINE PIPE OF A KIND USED FOR OIL OR GAS PIPELINES OR CASING AND TUBING OF A KIND USED IN DRILLING FOR OIL OR GAS, AND TUBES AND PIPES AND HOLLOW PROFILES OF SQUARE OR RECTANGULAR CROSS-SECTION)
73069000	TUBES, PIPES AND HOLLOW PROFILES "E.G., OPEN SEAM, RIVETED OR SIMILARLY CLOSED", OF IRON OR STEEL (EXCL. OF CAST IRON, SEAMLESS OR WELDED TUBES AND PIPES AND TUBES AND PIPES HAVING INTERNAL AND EXTERNAL CIRCULAR CROSS-SECTIONS AND AN EXTERNAL DIAMETER OF $> 406,4$ MM)
73071110	TUBE OR PIPE FITTINGS OF NON-MALLEABLE CAST IRON, OF A KIND USED IN PRESSURE SYSTEMS
73071190	TUBE OR PIPE FITTINGS OF NON-MALLEABLE CAST IRON (EXCL. PRODUCTS OF A KIND USED IN PRESSURE SYSTEMS)
73071990	CAST TUBE OR PIPE FITTINGS OF STEEL

CN8	Description
73090010	RESERVOIRS, TANKS, VATS AND SIMILAR CONTAINERS, OF IRON OR STEEL, FOR GASES OTHER THAN COMPRESSED OR LIQUEFIED GAS, OF A CAPACITY OF > 300 L (EXCL. CONTAINERS FITTED WITH MECHANICAL OR THERMAL EQUIPMENT AND CONTAINERS SPECIFICALLY CONSTRUCTED OR EQUIPPED FOR ONE OR MORE TYPES OF TRANSPORT)
73090030	RESERVOIRS, TANKS, VATS AND SIMILAR CONTAINERS, OF IRON OR STEEL, FOR LIQUIDS, LINED OR HEAT-INSULATED AND OF A CAPACITY OF > 300 L (EXCL. CONTAINERS FITTED WITH MECHANICAL OR THERMAL EQUIPMENT AND CONTAINERS SPECIFICALLY CONSTRUCTED OR EQUIPPED FOR ONE OR MORE TYPES OF TRANSPORT)
73090051	RESERVOIRS, TANKS, VATS AND SIMILAR CONTAINERS, OF IRON OR STEEL, FOR LIQUIDS, OF A CAPACITY OF > 100.000 L (EXCL. CONTAINERS LINED OR HEAT-INSULATED OR FITTED WITH MECHANICAL OR THERMAL EQUIPMENT AND CONTAINERS SPECIFICALLY CONSTRUCTED OR EQUIPPED FOR ONE OR MORE TYPES OF TRANSPORT)
73090059	RESERVOIRS, TANKS, VATS AND SIMILAR CONTAINERS, OF IRON OR STEEL, FOR LIQUIDS, OF A CAPACITY OF <= 100.000 L BUT > 300 L (EXCL. CONTAINERS LINED OR HEAT-INSULATED OR FITTED WITH MECHANICAL OR THERMAL EQUIPMENT AND CONTAINERS SPECIFICALLY CONSTRUCTED OR EQUIPPED FOR ONE OR MORE TYPES OF TRANSPORT)
73110011	CONTAINERS OF IRON OR STEEL, SEAMLESS, FOR COMPRESSED OR LIQUEFIED GAS, FOR A PRESSURE >= 165 BAR, OF A CAPACITY < 20 L (EXCL. CONTAINERS SPECIFICALLY CONSTRUCTED OR EQUIPPED FOR ONE OR MORE TYPES OF TRANSPORT)
73110013	CONTAINERS OF IRON OR STEEL, SEAMLESS, FOR COMPRESSED OR LIQUEFIED GAS, FOR A PRESSURE >= 165 BAR, OF A CAPACITY >= 20 L TO <= 50 L (EXCL. CONTAINERS SPECIFICALLY CONSTRUCTED OR EQUIPPED FOR ONE OR MORE TYPES OF TRANSPORT)
73110019	CONTAINERS OF IRON OR STEEL, SEAMLESS, FOR COMPRESSED OR LIQUEFIED GAS, FOR A PRESSURE >= 165 BAR, OF A CAPACITY > 50 L (EXCL. CONTAINERS SPECIFICALLY CONSTRUCTED OR EQUIPPED FOR ONE OR MORE TYPES OF TRANSPORT)
73110030	CONTAINERS OF IRON OR STEEL, SEAMLESS, FOR COMPRESSED OR LIQUEFIED GAS, FOR A PRESSURE < 165 BAR (EXCL. CONTAINERS SPECIFICALLY CONSTRUCTED OR EQUIPPED FOR ONE OR MORE TYPES OF TRANSPORT)
73110091	CONTAINERS OF IRON OR STEEL, SEAMLESS, FOR COMPRESSED OR LIQUEFIED GAS, OF A CAPACITY OF < 1.000 L (EXCL. SEAMLESS CONTAINERS AND CONTAINERS SPECIFICALLY CONSTRUCTED OR EQUIPPED FOR ONE OR MORE TYPES OF TRANSPORT)
73110099	CONTAINERS OF IRON OR STEEL, SEAMLESS, FOR COMPRESSED OR LIQUEFIED GAS, OF A CAPACITY OF >= 1.000 L (EXCL. SEAMLESS CONTAINERS AND CONTAINERS SPECIFICALLY CONSTRUCTED OR EQUIPPED FOR ONE OR MORE TYPES OF TRANSPORT)

CN8	Description
76110000	RESERVOIRS, TANKS, VATS AND SIMILAR CONTAINERS, OF ALUMINIUM, FOR ANY MATERIAL (OTHER THAN COMPRESSED OR LIQUEFIED GAS), OF A CAPACITY OF > 300 L, NOT FITTED WITH MECHANICAL OR THERMAL EQUIPMENT, WHETHER OR NOT LINED OR HEAT-INSULATED (EXCL. CONTAINERS SPECIFICALLY CONSTRUCTED OR EQUIPPED FOR ONE OR MORE TYPES OF TRANSPORT)
76130000	ALUMINIUM CONTAINERS FOR COMPRESSED OR LIQUEFIED GAS
84021100	WATERTUBE BOILERS WITH A STEAM PRODUCTION > 45 T/HOUR
84021200	WATERTUBE BOILERS WITH A STEAM PRODUCTION <= 45 T/HOUR (EXCL. CENTRAL HEATING HOT WATER BOILERS CAPABLE ALSO OF PRODUCING LOW PRESSURE STEAM)
84021910	FIRETUBE BOILERS (EXCL. CENTRAL HEATING HOT WATER BOILERS CAPABLE ALSO OF PRODUCING LOW PRESSURE STEAM)
84021990	VAPOUR GENERATING BOILERS, INCL. HYBRID BOILERS (EXCL. WATERTUBE BOILERS, FIRETUBE BOILERS AND CENTRAL HEATING HOT WATER BOILERS CAPABLE ALSO OF PRODUCING LOW PRESSURE STEAM)
84022000	SUPERHEATED WATER BOILERS
84029000	PARTS OF VAPOUR GENERATING BOILERS AND SUPERHEATED WATER BOILERS, N.E.S.
84031010	CENTRAL HEATING BOILERS, NON-ELECTRIC, OF CAST IRON (EXCL. VAPOUR GENERATING BOILERS AND SUPERHEATED WATER BOILERS OF HEADING 8402)
84031090	CENTRAL HEATING BOILERS, NON-ELECTRIC (EXCL. OF CAST IRON, AND VAPOUR GENERATING BOILERS AND SUPERHEATED WATER BOILERS OF HEADING 8402)
84039010	PARTS OF CENTRAL HEATING BOILERS OF CAST IRON, N.E.S.
84039090	PARTS OF CENTRAL HEATING BOILERS, N.E.S.
84041000	AUXILIARY PLANT FOR USE WITH BOILERS OF HEADING 8402 OR 8403, E.G. ECONOMIZERS, SUPERHEATERS, SOOT REMOVERS AND GAS RECOVERERS;
84042000	CONDENSERS FOR STEAM OR OTHER VAPOUR POWER UNITS
84148022	RECIPROCATING DISPLACEMENT COMPRESSORS, HAVING A GAUGE PRESSURE CAPACITY <= 15 BAR, GIVING A FLOW/H <= 60 M ³ (EXCL. COMPRESSORS FOR REFRIGERATING EQUIPMENT AND AIR COMPRESSORS MOUNTED ON A WHEELED CHASSIS FOR TOWING)
84148028	RECIPROCATING DISPLACEMENT COMPRESSORS, HAVING A GAUGE PRESSURE CAPACITY <= 15 BAR, GIVING A FLOW/H > 60 M ³ (EXCL. COMPRESSORS FOR REFRIGERATING EQUIPMENT AND AIR COMPRESSORS MOUNTED ON A WHEELED CHASSIS FOR TOWING)

CN8	Description
84148051	RECIPROCATING DISPLACEMENT COMPRESSORS, HAVING A GAUGE PRESSURE CAPACITY > 15 BAR, GIVING A FLOW/H <= 120 M³ (EXCL. COMPRESSORS FOR REFRIGERATING EQUIPMENT AND AIR COMPRESSORS MOUNTED ON A WHEELED CHASSIS FOR TOWING)
84148059	RECIPROCATING DISPLACEMENT COMPRESSORS, HAVING A GAUGE PRESSURE CAPACITY > 15 BAR, GIVING A FLOW/H > 120 M³ (EXCL. COMPRESSORS FOR REFRIGERATING EQUIPMENT AND AIR COMPRESSORS MOUNTED ON A WHEELED CHASSIS FOR TOWING)
84195020	HEAT EXCHANGE UNITS MADE OF FLUOROPOLYMERS AND WITH INLET AND OUTLET TUBE BORES WITH INSIDE DIAMETERS MEASURING <=3 CM
84195080	HEAT-EXCHANGE UNITS (EXCL. THOSE USED WITH BOILERS AND THOSE MADE OF FLUOROPOLYMERS WITH INLET AND OUTLET TUBE BORES WITH INSIDE DIAMETERS MEASURING <=3 CM)
84196000	MACHINERY FOR LIQUEFYING AIR OR OTHER GASES
84241000	FIRE EXTINGUISHERS, WHETHER OR NOT CHARGED
84243001	WATER CLEANING APPLIANCES WITH BUILT-IN MOTOR, WITH HEATING DEVICE
84243008	WATER CLEANING APPLIANCES WITH BUILT-IN MOTOR, WITHOUT HEATING DEVICE
84243010	STEAM OR SAND BLASTING MACHINES AND SIMILAR JET PROJECTING MACHINES, COMPRESSED AIR OPERATED
84243090	STEAM OR SAND BLASTING MACHINES AND SIMILAR JET PROJECTING MACHINES (EXCL. COMPRESSED AIR OPERATED AND WATER CLEANING APPLIANCES WITH BUILT-IN MOTOR AND APPLIANCES FOR CLEANING SPECIAL CONTAINERS)
84811019	PRESSURE-REDUCING VALVES OF CAST IRON OR STEEL (NOT COMBINED WITH FILTERS OR LUBRICATORS)
84811099	PRESSURE-REDUCING VALVES OF BASE METAL (NOT COMBINED WITH FILTERS OR LUBRICATORS)
84812010	VALVES FOR THE CONTROL OF OLEOHYDRAULIC POWER TRANSMISSION
84812090	VALVES FOR THE CONTROL OF PNEUMATIC POWER TRANSMISSION
84813091	CHECK "NON-RETURN" VALVES FOR PIPES, BOILER SHELLS, TANKS, VATS OR THE LIKE, OF CAST IRON OR STEEL
84813099	CHECK "NON-RETURN" VALVES FOR PIPES, BOILER SHELLS, TANKS, VATS OR THE LIKE (EXCL. THOSE OF CAST IRON OR STEEL)
84814010	SAFETY OR RELIEF VALVES OF CAST IRON OR STEEL
84814090	SAFETY OR RELIEF VALVES (EXCL. THOSE OF CAST IRON OR STEEL)
84818051	TEMPERATURE REGULATORS (EXCL. THERMOSTATIC VALVES FOR CENTRAL HEATING RADIATORS)

CN8	Description
84818059	PROCESS CONTROL VALVES (EXCL. TEMPERATURE REGULATORS, PRESSURE-REDUCING VALVES, VALVES FOR THE CONTROL OF OLEOHYDRAULIC OR PNEUMATIC POWER TRANSMISSION, CHECK VALVES AND SAFETY OR RELIEF VALVES, TAPS, COCKS AND VALVES FOR SINKS, WASHBASINS, BIDETS, WATER CISTERNS, BATHS AND SIMILAR FIXTURES AND CENTRAL HEATING RADIATOR VALVES)
84818061	GATE VALVES OF CAST IRON FOR PIPES, BOILER SHELLS, TANKS, VATS OR THE LIKE (EXCL. TAPS, COCKS AND VALVES FOR SINKS, WASHBASINS, BIDETS, WATER CISTERNS, BATHS AND SIMILAR FIXTURES AND CENTRAL HEATING RADIATOR VALVES)
84818063	GATE VALVES OF STEEL FOR PIPES, BOILER SHELLS, TANKS, VATS OR THE LIKE (EXCL. TAPS, COCKS AND VALVES FOR SINKS, WASHBASINS, BIDETS, WATER CISTERNS, BATHS AND SIMILAR FIXTURES AND CENTRAL HEATING RADIATOR VALVES)
84818069	GATE VALVES FOR PIPES, BOILER SHELLS, TANKS, VATS OR THE LIKE (EXCL. OF CAST IRON OR STEEL, AND TAPS, COCKS AND VALVES FOR SINKS, WASHBASINS, BIDETS, WATER CISTERNS, BATHS AND SIMILAR FIXTURES AND CENTRAL HEATING RADIATOR VALVES)
84818071	GLOBE VALVES OF CAST IRON (EXCL. TEMPERATURE REGULATORS, PRESSURE-REDUCING VALVES, VALVES FOR THE CONTROL OF OLEOHYDRAULIC OR PNEUMATIC POWER TRANSMISSION, CHECK VALVES AND SAFETY OR RELIEF VALVES, PROCESS CONTROL VALVES, TAPS, COCKS AND VALVES FOR SINKS, WASHBASINS, BIDETS, WATER CISTERNS, BATHS AND SIMILAR FIXTURES, AND CENTRAL HEATING RADIATOR VALVES)
84818073	GLOBE VALVES OF STEEL (EXCL. TEMPERATURE REGULATORS, PRESSURE-REDUCING VALVES, VALVES FOR THE CONTROL OF OLEOHYDRAULIC OR PNEUMATIC POWER TRANSMISSION, CHECK VALVES AND SAFETY OR RELIEF VALVES, PROCESS CONTROL VALVES, TAPS, COCKS AND VALVES FOR SINKS, WASHBASINS, BIDETS, WATER CISTERNS, BATHS AND SIMILAR FIXTURES, AND CENTRAL HEATING RADIATOR VALVES)
84818079	GLOBE VALVES (EXCL. VALVES OF CAST IRON OR STEEL, TEMPERATURE REGULATORS, PRESSURE-REDUCING VALVES, VALVES FOR THE CONTROL OF OLEOHYDRAULIC OR PNEUMATIC POWER TRANSMISSION, CHECK VALVES AND SAFETY OR RELIEF VALVES, PROCESS CONTROL VALVES, TAPS, COCKS AND VALVES FOR SINKS, WASHBASINS, BIDETS, WATER CISTERNS, BATHS AND SIMILAR FIXTURES, AND CENTRAL HEATING RADIATOR VALVES)
84818081	BALL AND PLUG VALVES FOR PIPES, BOILER SHELLS, TANKS, VATS OR THE LIKE (EXCL. TAPS, COCKS AND VALVES FOR SINKS, WASHBASINS, BIDETS, WATER CISTERNS, BATHS AND SIMILAR FIXTURES, AND CENTRAL HEATING RADIATOR VALVES)
84818085	BUTTERFLY VALVES FOR PIPES, BOILER SHELLS, TANKS, VATS OR THE LIKE (EXCL. CHECK VALVES)
84818087	DIAPHRAGM VALVES FOR PIPES, BOILER SHELLS, TANKS, VATS OR THE LIKE
90262020	ELECTRONIC INSTRUMENTS AND APPARATUS FOR MEASURING OR CHECKING PRESSURE OF LIQUIDS OR GASES (EXCL. REGULATORS)

CN8	Description
90262040	SPIRAL OR METAL DIAPHRAGM TYPE PRESSURE GAUGES
90262080	INSTRUMENTS AND APPARATUS FOR MEASURING OR CHECKING PRESSURE OF LIQUIDS OR GASES, NON-ELECTRONIC (EXCL. SPIRAL OR METAL DIAPHRAGM TYPE PRESSURE GAUGES, AND REGULATORS)
73110011	CONTAINERS OF IRON OR STEEL, SEAMLESS, FOR COMPRESSED OR LIQUEFIED GAS, FOR A PRESSURE \geq 165 BAR, OF A CAPACITY $<$ 20 L (EXCL. CONTAINERS SPECIFICALLY CONSTRUCTED OR EQUIPPED FOR ONE OR MORE TYPES OF TRANSPORT)