



Alura Group

Regulatory, Marketing & Sales Solutions

Dave Walker
Primary Fluid Systems
1050 Cooke Boulevard
Burlington, Ontario
Canada L7T 4A8

Date: May 19, 2009

Subject: Non-applicability CE Marking to Primary Fluid Systems products

Dear Mr. Walker,

With this letter Alura Group, confirms that on the request of Primary Fluid Systems we conducted an investigation on the applicability of the European New Approach Directives and the CE Marking to the following Primary Fluid Systems products:

- 1.) ACCUDRAW® Calibration Cylinder - AC Series Sizes 100 mL, 250 mL, 500 mL, 1000 mL, 2000 mL, 4000mL
- 2.) ACCUDRAW® Calibration Cylinder - PV Series Sizes 100 mL, 250 mL, 500 mL, 1000 mL, 2000 mL, 4000mL, 10000 mL, 20000 mL
- 3.) ACCUDRAW® Calibration Cylinder - ACS#2 Series Sizes 100 mL, 250 mL, 500 mL, 1000 mL, 2000 mL, 4000mL, 6000 mL, 8000 mL, 10000 mL, 20000 mL
- 4.) ACCUDRAW® 4,000 ml Graduated Polypropylene Cylinder
- 5.) CLEARVIEW Calibration Cylinder - CV Series Sizes 100 mL, 250 mL, 500 mL, 1000 mL, 2000 mL, 4000mL, 6000 mL, 8000 mL, 10000 mL, 20000 mL
- 6.) CLEARVIEW Calibration Cylinder - CVS#2 Series Sizes 100 mL, 250 mL, 500 mL, 1000 mL, 2000 mL, 4000mL, 6000 mL, 8000 mL, 10000 mL, 20000 mL

We can confirm that these type of product does not fall within the scope of any of the European 'New Approach Directives', which would require the product to be CE Marked before placing on the market, or putting into service, in the European Economic Area. Please note that these products are not covered by the Pressure Equipment Directive 97/23/EC.

This means that the CE Marking is not a requirement for the specified Primary Fluid Systems products to be allowed to be sold or used in the European Economic Area. And thus it would be even unlawful to affix the CE Marking.

Yours Sincerely,

Mr. Han Zuyderwijk
President and CEO



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- 1.) ECO Valve - A-Series Sizes DN 8 (1/4"), DN 10 (3/8"), DN 15 (1/2")
- 2.) ECO Valve - B-Series Sizes DN 15 (1/2")High Flow, DN 20 (3/4"), DN 25 (1")
- 3.) ECO Valve - C-Series Sizes DN 25 (1"), DN 32 (1-1/4"), DN 40 (1-1/2"), DN 50 (2")
- 4.) ECO Valve - D-Series Sizes DN 50 (2")High Flow, DN 80 (3"), DN 100 (4")
- 5.) Top Valve - Back Pressure and Pressure Relief Valve (Standard, High Pressure and High Temperature) Sizes: 1/4" (DN 8), 1/4" x 1/2" (DN 15), 1/2" (DN 15), 3/4" (DN 20), 1" (DN 25), 1-1/2" (DN 40), 2" (DN 50)
- 6.) PFS Injection Quill Sizes: 1/2" (DN 15), 3/4" (DN 20), 1" (DN 25)
- 7.) PFS Corporation Stop Sizes: 1/2" (DN 15), 3/4" (DN 20), 1" (DN 25), 1-1/2" (DN 40), 2" (DN 50)
- 8.) PFS Corporation Stop (Retractable Under Pressure) Sizes: 1/2" (DN 15), 3/4" (DN 20)
- 9.) ACCU-VENT Automatic Degassing Valve Sizes: 1/2" Inlet, 3/4" Inlet

The aforementioned products are covered by Article 3, paragraph 3 of the Pressure Equipment Directive 97/23/EC. This provision requires products to be designed and manufactured in accordance with sound engineering practices, but does not allow the affixing of the CE marking. And thus it would be even unlawful to affix the CE Marking.

Yours Sincerely,

Mr. Han Zuyderwijk
President and CEO