TECHNICAL QUICK REFERENCE FOR BUYERS

EN 10204:2004 Inspection Documents

What 2.1, 2.2, 3.1 and 3.2 actually guarantee, who is entitled to validate them, what a 3.1 certificate must contain, and the wording that makes a purchase order enforceable.

TYPES 2.1 / 2.2 / 3.1 / 3.2 | 3.1 CONTENT CHECKLIST | 1991 TO 2004 MAPPING | PO WORDING

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01 What the standard does — and does not — control

EN 10204:2004 was approved by CEN on 8 August 2004 and supersedes EN 10204:1991. Clause 1.1 sets its scope: it specifies the different types of inspection documents supplied to the purchaser, in accordance with the requirements of the order, for the delivery of metallic products — plates, sheets, bars, forgings, castings — whatever their method of production. Clause 1.3 adds the sentence buyers most often overlook: the standard is used **in conjunction with the product specifications** that set the technical delivery conditions.

What EN 10204 fixes

- ☐ Which document types exist, and their exact titles
- ☐ Whether results rest on specific or non-specific inspection
- ☐ Who is entitled to validate the document
- ☐ How documents and copies may be transmitted

What it does not fix

- ☐ Chemistry, mechanical properties, tolerances
- ☐ Which tests must be performed, or how many
- ☐ Acceptance limits and test frequencies
- ☐ The layout, language or paper of the certificate

Those come from the product specification named in the order — EN 10216-5 for seamless stainless tube, ASTM A312 for welded austenitic pipe, ASTM A213 for heat exchanger tube, ASTM B622 for nickel alloy seamless pipe and tube. A 3.1 certificate without impact results is not a defective certificate if no impact test was ordered. Conversely, a 3.1 certificate never proves that a test was right; it proves that a test was done, on a defined unit, and validated inside the manufacturer.

02 The four document types

Type	English designation	German	French	Document content	Validated by
2.1	**Declaration of compliance with the order**	Werksbescheinigung	Attestation de conformité à la commande	Statement that the products comply with the order. **No test results.**	The manufacturer
2.2	**Test report**	Werkszeugnis	Relevé de contrôle	Statement of compliance, with results of **non-specific** inspection.	The manufacturer
3.1	**Inspection certificate 3.1**	Abnahmeprüfzeugnis 3.1	Certificat de réception 3.1	Statement of compliance, with results of **specific** inspection.	The manufacturer's authorised inspection representative, independent of the manufacturing department
3.2	**Inspection certificate 3.2**	Abnahmeprüfzeugnis 3.2	Certificat de réception 3.2	Statement of compliance, with results of **specific** inspection.	The above **and** the purchaser's authorised inspection representative, or the inspector designated by official regulations

Table 1 · Designations and validation, per Clauses 3, 4 and Annex A, Table A.1. The German and French titles are the ones that appear on certificates actually received from European mills — useful when a document arrives in a language the buyer does not read.

> **Read the title, not the number**
> A Werkszeugnis (2.2) and an Abnahmeprüfzeugnis (3.1) differ by four letters and by everything that matters: the first rests on inspection that may not have covered the goods supplied, the second on inspection of the goods or the test unit they belong to. Certificates are mis-filed at receiving desks constantly.

03 Specific inspection versus non-specific inspection

Clause 2.1 defines **non-specific inspection** as inspection carried out by the manufacturer in accordance with its own procedures, to assess whether products defined by the same product specification and made by the same manufacturing process comply with the order. The standard adds one decisive sentence: **the products inspected are not necessarily the products actually supplied.**

Clause 2.2 defines **specific inspection** as inspection carried out before delivery, according to the product specification, on the products to be supplied or on test units of which the supplied products are part, to verify that they comply with the order.

That distinction is the whole architecture of the standard. Types 2.1 and 2.2 rest on non-specific inspection; types 3.1 and 3.2 rest on specific inspection. A Type 2.2 test report can be perfectly honest and still describe a different heat from the one in your warehouse.

04 What a 3.1 inspection certificate must contain

Clause 4.1 defines the document by what it declares and by who validates it, not by a prescribed form. Layouts differ between mills and between languages, so read by meaning rather than by position. In practice a buyer must be able to find all of the following:

1. Name and address of the manufacturer, and the name of the issuing organisation
2. Document title naming the type — "Inspection certificate 3.1" — not merely a number
3. Order number or contract reference, and the date of issue
4. Product description: grade and UNS / EN designation, product form (pipe or tube), dimensions
5. Product specification and edition invoked by the order, e.g. EN 10216-5, ASTM A312, ASTM A213
6. Heat number, cast number or manufacturing lot, traceable to the marking on the goods
7. Chemical composition with the limits of the specification, and the actual result per element
8. Mechanical properties actually tested, with test standard, test piece orientation and results
9. Heat treatment condition and the temperature / holding time where the specification requires them
10. Non-destructive or pressure test performed, with method, coverage and result
11. Name and position of the responsible person validating the document (Clause 5), legible

> **Three failures recur, and all three are cheaper to fix before shipment.** First, a certificate whose heat number does not match the stencil on the pipe and the number on the packing list — the document is then worthless as traceability, however good the results. Second, a stamp with no legible name or position, which fails Clause 5. Third, values repeated identically across different heats, or a reported heat size larger than the shipment could plausibly have come from.

05 Results transferred from incoming material

Clauses 4.1 and 4.2 both permit the manufacturer to transfer onto the certificate relevant test results obtained by **specific inspection on primary or incoming products** it uses, provided it operates traceability procedures and can provide the corresponding inspection documents. In tube production this is routine: a mill drawing seamless tube from purchased hollows may report the chemical analysis of the incoming material on the finished-tube certificate.

That is lawful. What the buyer must confirm is that the results remain traceable to the delivered heat and that the certificate shows the traceability. Where the order requires tests on the finished product — tensile properties after the final heat treatment, for example — incoming-material results cannot substitute for them.

06 3.1 versus 3.2

Question	Type 3.1	Type 3.2
Prepared by	The manufacturer's authorised inspection representative	The manufacturer's representative **and** the purchaser's representative, or the inspector designated by official regulations
Independent of production	Yes — internal independence is required	Yes, plus an external signatory
Basis of inspection	Specific inspection	Specific inspection
Witnessing of tests	Not required	Normally the point of the type: tests may be witnessed
Typical use	Pressure piping, heat exchanger tube, general project supply	Offshore, nuclear, classified or end-user-mandated scopes
Lead time impact	Minimal	Requires scheduling around the witness point

Table 2 · Compiled from Clauses 4.1, 4.2 and Annex A. The reverse substitution — supplying 3.2 where 3.1 was ordered — is normally acceptable; a 3.1 where 3.2 was specified is not.

07 Mapping the 1991 types onto the 2004 edition

The Foreword of EN 10204:2004 lists the main changes, and this is the one that still causes disputes, because many older drawings, project specifications and approved vendor lists still cite the 1991 designations.

EN 10204:1991	EN 10204:2004	Effect
Type 2.1	Type 2.1	Unchanged in substance
Type 2.2	Type 2.2	Unchanged in substance
Type 2.3	—	**Deleted.** No equivalent in the 2004 edition
Type 3.1.B	**Type 3.1**	Certificate validated inside the manufacturer
Type 3.1.A	**Type 3.2**	Now requires a second, independent signatory
Type 3.1.C	**Type 3.2**	Now requires a second, independent signatory
Inspection report 3.2	**Type 3.2**	Merged into the single 3.2 type

Table 3 · Source: Foreword, "The main changes". The standard also introduced the definitions of manufacturer (2.3), intermediary (2.4) and product specification (2.5).

> **The 3.1B trap**
> A specification that asks for "3.1B" is asking for what is now simply 3.1. A specification that asks for "3.1A" is asking for what is now 3.2 — that is, an outside signatory, and a witness point that has to be planned. Quoting 3.1 against a 3.1A requirement leaves the document non-compliant, even though the number looks higher.

08 Intermediaries, stockists and copies

Clause 2.4 defines an intermediary as an organisation supplied with products by manufacturers which then supplies them onwards, without further processing or after processing that does not change the specified properties. Clause 6 governs the paperwork: an intermediary passes on **either the original or a copy, without any alteration**, accompanied by suitable means of identifying the product so that traceability is maintained.

Copying is permitted where traceability procedures are operated and the original is available on request, and on a copy it is permissible to replace the original delivered quantity with the actual partial quantity. Altering the manufacturer's name, address or results is not permitted: an intermediary that changes the specified properties becomes a manufacturer and must issue its own document in addition to passing on the original.

When buying from stock, request both the mill certificate and the stockist's traceability reference, and verify that the heat numbers still correspond to the marking after cutting.

09 Pressure equipment and the PED

Annex ZA of EN 10204:2004 relates Clauses 3 and 4 to Annex I, section 4.3 of Directive 97/23/EC, and notes that the Directive's term "certificate of specific product control" is equivalent to this standard's "inspection document based on specific inspection". Figure ZA.1 sets out which document type satisfies section 4.3 for each category of pressure equipment.

> Directive 97/23/EC has since been replaced by the Pressure Equipment Directive 2014/68/EU, whose Annex I 4.3 carries the equivalent requirement structure. EN 10204:2004 itself has not been revised, so its Annex ZA still cites the earlier Directive — that is normal and does not invalidate the standard. Where the equipment falls under 2014/68/EU, confirm the acceptable document type with the notified body and the material specification before the order is placed, not at the witness point.

Annex ZA is informative. It creates a presumption of conformity within the scope of the standard; it does not discharge the equipment manufacturer's own obligations under conformity assessment.

10 Ten checks before you accept a certificate

- [ ] Does the document say **3.1**, not simply "3.1" in a footer while the title says 2.2?
- [ ] Does the heat number match the stencil on the pipe, the bundle tag and the packing list?
- [ ] Is the grade and UNS number the one ordered — 316L is not S31600 unless S31603 was accepted?
- [ ] Are the chemical results compared against the *specified* limits, or only listed without limits?
- [ ] Is the test standard cited for tensile and impact tests, and is the test piece orientation stated?
- [ ] Is the heat treatment condition stated, and does it match the ordered delivery condition?
- [ ] For 3.2, is the second signature actually present, with the body it represents identified?
- [ ] Is the validating person named *and* their position given, as Clause 5 requires?
- [ ] Do the reported values differ plausibly between heats, rather than repeating identically?
- [ ] If results came from incoming material, is the traceability to the delivered heat shown?

11 Wording for the RFQ and the purchase order

State the type, the standard and edition, the product specification, and the certificate's content requirements in the order itself. Anything left to the mill's default becomes the mill's default.

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Inspection documents: EN 10204:2004, inspection certificate type 3.1, in English,
issued and validated by the manufacturer's authorised inspection representative
independent of the manufacturing department, naming the responsible person and position.

The certificate shall state: order number; grade and UNS / EN designation;
product form and dimensions; product specification and edition; heat number traceable
to the marking on the goods; chemical composition against the specified limits;
tensile properties with test standard and test piece orientation; heat treatment
condition with temperature and holding time; result of the hydrostatic or non-destructive
electric test with method and coverage.

Not acceptable: type 2.1 or 2.2 in place of 3.1; a certificate in the name of an
intermediary that has altered the manufacturer's name, address or results; results
transferred from incoming material without traceability to the delivered heat.

Where the order is placed on a stockist: supply the original mill certificate plus
the stockist's traceability reference, per EN 10204:2004 Clause 6.
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Two sentences do most of the work: naming the type explicitly, and naming the person or function that must validate it. Everything else in the template exists to make the first two checkable on arrival.

12 The ASTM equivalent, in one paragraph

US practice works with mill test reports rather than EN 10204 types. An ASTM MTR is normally issued by the mill under its own quality system and does not carry the “independent of the manufacturing department” validation that Clause 4.1 requires, nor a second signatory. Where a European specification governs, an ASTM MTR is therefore not automatically a 3.1 certificate; where an ASTM specification governs, EN 10204 types are not normally called for at all. Mixed-standard projects should name both the material specification and the document requirement separately, so that the two are not conflated.

Basis of this document. Prepared by Wenzhou Xinzhe Tech Co., Ltd. as an independent technical overview for buyers. Facts and clause references were checked against the published English text of EN 10204:2004 (reference EN 10204:2004: E) in November 2026. This is a summary written by the publisher; it is not a reproduction of the standard and carries no clause text. The complete standard is available from CEN and the national standards bodies, and EN 10204 should always be read together with the product specification named in the order. Acceptance decisions remain with the contract and the governing design code.

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