

## **34<sup>th</sup> RSG meeting Brussels, Belgium**

**10-11 May 2007**

This was the 34<sup>th</sup> meeting of the Recreational Craft Sectoral Group. The group consists of all the Notified Bodies (NB) for the Recreational Craft Directive, and representatives of industry. NMMA is a member of this group. The main objective of the meeting was to deal with issues concerning the pending applicability of the Amended Recreational Craft Directive.

ADCO, the EU surveillance authorities, sent one British representative to this RSG meeting,

PFE – Proposal for Inquiry

IDG – Internet Discussion Document

N/B – Notified Body

CEN – International Standardization Organization in Europe

WG – ISO Work Group

PCA – Post Construction Assessment

### Action Items Outstanding

- All N/Bs were directed to list their authorized products on the RSG website but to date only 11 are reporting and 19 N/Bs are still yet to report. Notifications are given to member states but there is little enforcement of this request.
- Final draft version of the ABYC canoe and kayak standard is in review by the US Paddlesports Association. Item of question is flotation requirements in canoes. Approved version will be sent to secretariat when available this summer. Action: NMMA
- N/Bs are to inform the Commission of their intentions/approvals to conduct Post Construction Assessments. There appears to be a number of questionable PSA activities in the EU. The Commission is aware of these activities but has done very little to date.
- ISO WG 22 will begin a study of the handling characteristics of craft up to 8m. (Design Categories C&D).
- Misinformation on the RSG website will remain until changed by member states. The Commission cannot change this information on the website.

### Post Construction Assessment Questions

- There are no Assessment Modules for PCA. Can Module G or other modules be used?
- The directive requires all essential safety requirements be assessed in PCA including construction, exhaust and sound. A N/B not notified in a particular element can subcontract out that particular element to an N/B that is notified in that element.
- Annex II components do not have to comply with the RCD. Engines do not have to comply with the current Amended RCD if they have complied with a previous standard or regulation at the time of construction, as noted in the RSG Guidelines. Engine rooms are to be inspected for upkeep.
- A straw survey of the N/Bs found that there are very few legal PCAs being done.
- The RSG proposed to develop a standardized template / report to be used in the conduct of a PCA. NMMA felt that this could be a very helpful document in helping owners to identify the scope of a PCA on their boats. The boats assessed without an installed engine must also have the engine assessed for sound and emissions.

### Activities of the New Approach – Mrs. Rita l'Abbate, DG ENTR

- The entire set of new approach directives and directive implementation are under review. Reasons: lack of enforcement, lack of faith in the CE mark, lack of ease in implementation, trade barriers.
- Elements under review: Surveillance, Notified Bodies, CE mark, implementation, and assessment.
- There are currently requirements for Notification of N/Bs but no common requirements for the accreditation bodies of member states. These requirements will be standardized in this new approach.
- The CE mark will become a trademark.
- Market surveillance (ADCO) will become a regulation of all member states. This will require states to have these activities. Many states do not have these today.

### Rules of Procedures

- CAP group proposed to have two subgroup meetings a year, one in the spring and one in the fall. Also proposed to have only one annual RSG meeting. NMMA requested that all 3 subgroups meet at the same time to save expenses and travel time of attendees.

- Subgroup decisions will be available for internet discussion and vetoes will be resolved in this discussion prior to the plenary meeting.

#### RSG Rules of Operation (CAP Subgroup)

- IDG #190 (RFU #78) – What are the acceptable tolerances that can be applied to products so that a reassessment does not have to be done? A flow chart and recommended form was proposed as a decision model to be used.
- IDG #206 –Do certification certificates have a time limit for validation? No, validity conditions are defined in 94/25/EC, unless there are other requirements imposed on the N/B by the accreditation body. Since this was deemed a legal question it will be sent to the standing committee for resolution.
- The revised Guidelines, slim version, is still under review in this subgroup and will be available in June 2008.

#### RSG Design and Construction Subgroup

- IDG #203 – Inflatable boats under 8m cannot use ISO 12217, Stability, even if in category B. ISO 6185, Inflatables, does not address design categories and should be revised. This discrepancy will be discussed in the next subgroup meeting.

#### RSG Exhaust Subgroup

- No action.

#### Amended RSG Guidelines

- No revisions submitted for 2007. Added additional references and approved PFEs. Will be available in 2 weeks.

#### ADCO Report

- Working on DOCs. These are still only recommended by ADCO.
- ADCO may be doing surveillance checks at EU boat shows.
- Concerned about MICs issued by N/Bs.
- Who should keep the technical file in Post Construction Assessment? ADCO determined that the N/B keeps a copy and the owner should also have a copy.
- ADCO created a working group to standardize definitions used in directives.
- Should the subgroups look at the Rapid Alert Procedure EXchange (RAPEX) notification procedures? This is an all-product process and associated database and recreational boat information is difficult to break out.
- A boat that has an EC certification based on a draft standard **does not require a new assessment** upon issue of the harmonized standard.

#### DG Enterprises Report

- The RCD files will be overseen by new units in the Commission. The commission representative to the RCD, Johan Renders, has been retained for assignment in the RCD. Renders will also be involved in the machinery exhaust emissions work.
- Progress on the amended CC Guide has been postponed until additional personal resources are found.

#### CEN Consultant

- New CEN consultant Nigel Saw from BMF.
- Reviewing ISO 10088, Fuel systems.
- Availability of the CEN consultant is based on \$ and location (Brussels and London). ISO Work Group attendance is the first priority.

#### RSG Technical Secretary Report

- Occasionally receives a technical and RSG member contact question and is referred to the Chair of the RSG.
- Needs clarification from the N/Bs in Netherlands as to their status. NKIP apparently is changing their name. The Commission should be notified.
- The MIC for a builder from a country without a MIC generating agency will come from the country where the boat is being put on the market. The country code remains the country where the boat was built.

#### RSG Costs Survey

- The N/Bs were asked to provide costs of their services and very few responded with this information. Next step? There are differences in costs and requirements for accreditation in the members states, (i.e., France has no costs). The RSG requested that the Commission inquire as to these differences. The Commission will be looking to harmonize accreditation procedures in the member states.

#### ICOMIA Technical Report

- Last Technical Committee held in April in New Zealand
- Large yachts Technical Committee 8 will start to develop standards for these craft. ICOMIA will screen industry requirements. 2 draft standards approved for work groups and 2 submitted for review.
- Working on the standards harmonization initiative. First work is in ABYC/ISO standards.
- ICOMIA is maintaining an ISO improvement list.
- Next meeting will be during METS.

The next meeting of the RSG is tentatively scheduled for April 24-25, 2008 in Brussels. The next meetings of the subgroups were tentatively scheduled for October 15-16, 2007 in Eynatten, Belgium and January 28-29, 2008 in Düsseldorf.

The information contained herein is prepared by NMMA staff and intended for informational purposes and informal background use only. It is not intended to serve as an official report of the meeting's proceedings, actions or outcomes. This unofficial summary prepared by NMMA staff is not intended to generate any action on the part of any reader. The only recognized official transcript of any RSG meeting is the official minutes of the meeting generated by the meeting's convener or sponsor.