

**RSG Committee Meeting  
Berlin, Germany**

**6-7 May 2019**

This was a meeting of the Recreational Craft Sectoral Group (RSG) Committee. The RSG consists of the Notified Bodies (NBs) for the Recreational Craft Directive (RCD), and representatives of industry. NMMA is a member of this group. The main objective of the meeting is to deal with issues concerning the applicability of the Recreational Craft Directive.

PFE – Proposal for Inquiry

RFU – Recommendation for Use

ERFU – Endorsed RFU by the RCD Committee

DLI – Directive Legal Interpretation from the Commission

IDG – Internet Discussion Document

NB – Notified Body

HAS – Harmonized Standard Consultant

PCA – Post Construction Assessment

DoC – Declaration of Conformity

AdCo – Administrative Cooperation Groups (Surveillance Authorities)

**RCD Administration Topics**

- There are 31 Notified Bodies for RCD 2013/53/EU. About 70% of the NBs attended this meeting.
- RSG Structure
  - Proposed to have the AGM meeting combined with one of the subgroup meetings, thereby cutting one of the three RSG meetings per year. Another proposal was to have only two full RSG meetings a year. RSG decided to retain the 3 meetings a year format.
- RCD Commission Report
  - RCD working group meeting -
    - Turkish legislation on recreational craft is aligned with the RCD. Turkey can now issue MICs.
    - On a craft built by owner, then owner makes major craft conversion - this requires a PCA.
    - Commission will send a questionnaire to member states on their use of the RCD. Stakeholders will be consulted later. To begin in 2020. Focus on engine exhaust emissions and boat design categories.
    - Commission will look at the date of publication and date of implementation of harmonized standards. Not ready to formalize a single publication date.
    - RCD Expert Group will seek applications. Industry associations (ICOMIA) can apply.
    - Manufacturer's maximum recommended load – does it include propulsion batteries and electric motor? Yes, with regard to weight calculations. A PFE was created to reflect this decision.
- AdCo Report
  - Last AdCo meeting was held October 2019
    - How to determine major craft conversion. Working group formed. Will have “good examples” document.
    - WIN still a problem. Must it be on the POC? Members states not in agreement.
    - AdCo felt that not all harmonized standards reflect the requirements of the RCD. Standards must be checked (HAS?). Complaint from one member state.
    - Does adding a kite wing change the propulsion system?

- Asked RSG to define destructive vs non-destructive testing. This will be passed to TC188. (Glossary?)

### **Conformity Assessment Procedures (CAP) Subgroup Meeting**

#### PFE Actions

- PFE 206 – Validity of Certificates – There are no periods of validity for a certificate of examination according to the RCD. But a NB can set a period of validity due to external issues.
- PFE 328 – CE marking of hydraulic hose – Not an Annex 2 component so no CE mark.
- PFE 255 – Handling Characteristics craft >8m – Withdrawn due to ISO standard 11592-2.

### **Technical Information (TI) Subgroup Meeting**

#### PFE Actions

- PFE 322 – Extinguishing systems for all-electric boats – ISO 9094 addresses only OB and Inboard diesel engine boats. Electric boats also need a FF system even though they are not in the scope of the RCD. A new internal FF system does not need approval but is required to meet the standards.
- PFE 323 – Diesel engine shut down – Diesel engines should have an automatic shut down for both manual and automatic FF systems. Does an ignition switch satisfy this requirement? No, it should be a dedicated device.
- PFE 324 – Emergency Steering, stern-drive, remote controlled rudder system – Is a Sterndrive craft required to have emergency steering? The sterndrive is not considered a rudder. Therefore, it must have a separate emergency steering system.
- PFE 325 - Potable water contamination, sewage water outlet – these hull arrangements should be separated “as far as practicable”. Proposed sewage outlet to be on opposite side of the potable water inlet or if not practicable, overflow cannot flow toward the potable water inlet. Recommended this be addressed in ISO 8099.
- PFE 330 – Propulsion, electric propulsion, electric motor – What is the type of propulsion when there are various systems on a boat? If an electric motor is connected to a mechanical propeller, then is it still an electric powered craft? Answer: yes.
- PFE xxx – Electric motors and propulsion batteries – are they considered in the maximum load condition? Electric motors and its batteries shall be considered like an engine. Batteries for propulsion are considered in maximum load. Fixed batteries are part of the light craft mass.

### **ICOMIA report**

- TC 188 Update
  - 16 active WGs, 80+ ISO standards.
  - ISO WGs will meet at Boot Dusseldorf in January, at Plenary in Toronto in June, and at METS Amsterdam in November.
  - All three parts of the liferaft standard (ISO 9650) are under review.
  - ISO 9094, Fire Protection, and ISO 12133, CO detection systems, will be reviewed together.
  - Will dissolve SC2 and move the standards back to TC188.
  - Are normative references required to be dated? Yes.
  - Shared documents on ICOMIA website: Improvement list and Glossary.
  - New chair, and vice chair, of TC188 needed in 2020.
  - ISO 10087, Craft identification, 11591, Field of vision, and 11592-2, Maximum propulsion power for craft 8m-24m, have recently been published. 11591 has a 24 month transition period.

- ISO 8099-2, Sewage treatment systems, and 14945, Builder's plate, are under review.
- ISO 14946. Maximum load capacity, and 10240, Owner's manual, are due for FDIS ballot.
- ISO 11812, Cockpits, is in FDIS ballot. Numerous comments received so it probably won't be published.
- The usual scantling standards delays.
- ISO 12216, Windows, portlights, hatches, 9093, seacocks and thru-hull fittings, and 15083, Bilge pumping systems, in DIS ballot and under review.
- ISO 8849, DC bilge pumps, finishing DIS ballot.
- ISO 11105, Ventilation of petrol engine compartments, 25197, Electrical steering systems, 13590, PWC, under WG review.
- New steering wheel standard; all steering standards WGs will be meeting in Toronto.
- ISO 9650, Inflatable liferafts, all parts are under review.
- ISO 7840, Fire resistant hose, 8469, Non-fire resistant hose, amended.
- LPG propulsion standard will be a joint WG with TC22 SC41.
- New project in Li-ion batteries.
- ICOMIA has a technical file generator.
- ICOMIA working toward a life cycle assessment of craft.

### **RSG Guidelines Issues**

- RFU 317 – RIB, performance test – Keep this as an RFU due to questions/concerns of this RFU at the RCD expert level.
- Art 38, Point 4 – How does a NB adhere to the mandatory monitoring requirement of RCD? This topic was discussed at the RCD working group. Still a question with the NBs how to fulfill this requirement. “Monitoring” Is not defined, especially on modules A, A1 and B. Should be solved with the national authorities. The commission says it's a clear requirement but some NBs do not agree. To be continued.
- The RSG Guidelines will remain as is.

### **General RSG Issues**

- Reporting NB activities – A database of certificates issued and cancelled is maintained by the RSG Secretariat. 17 of 31 NB are submitting their certificates.
- Download of certificates – NBs requested that the RSG database be changed to allow all certificates to be downloaded and printed at the same time. Secretariat will streamline the downloaded information.
- Markets issues
  - Can a step in a deck be used as a sill? Or is this a two-level cockpit? This is not a sill according to the cockpit standard.
  - Larger craft should be involved in the stability standard; some are not.
  - What to do with old boats and engines built in the EU and now requiring CE for legal/commercial requirements. Is PCA appropriate? No. Must the engine be changed? No. Some NBs are certifying this type of boat as is. If it goes commercial then PCA does not apply. If CE is needed then another directive must be applied.
  - Foils on sailboats – Does the RCD apply to this type of boat? Does the stability standard apply? Only in displacement mode. Once flying it flies out of the RCD. CE for only the non-flying mode is not a solution. Needs a PFE. Needs an AdCo decision.
- RSG improvement list to the RCD
  - Ventilation of all petrol tank spaces
  - Hybrid drives
  - Clarify 4 PCA reasons

- Rigs are not excluded but not addressed
- Commission looking at exhaust emissions and design categories. Amended RCD not a given.
- Topics should be collected (Action Item)
  
- AdCo Issues –
  - NBs and AdCo should participate in ISO TC 188 WGs. Time and financial concerns. List will be created of all current NB participants in ISO standards WGs.
  
- RSG Improvement
  - The RSG decided to change the date of publication of the RSG Guidelines to 18 January (in lieu of June 16). The AGM will be changed to a fall/winter meeting date.

The next RSG subgroup meetings (and a brief AGM meeting) are scheduled for 16-17 October 2019 in Genoa, Italy.

The spring subgroup meetings are scheduled for 10-11 March 2020 in Dublin.

The summer/fall subgroup meetings will be scheduled at the Genoa meeting.

The next RSG Committee meeting is (tentatively) scheduled for fall/winter, 2020 in Brussels, Belgium.

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