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TO: BMD Board

RE: European Navigation Light Regulations

Many of you were aware of a meeting scheduled for 11/14 and 11/15 in Amsterdam to develop an international standard for navigation lights for recreational craft less than 24 meters in length. As some of you will be affected by the outcome, a summary of the background and end result might be of interest.

Those who export throughout the world have come to realize that navigation light regulations can vary from country to country – especially in Europe where virtually every country has its own rules. For nearly seven years there has been an ongoing attempt to standardize these rules worldwide. The efforts have focused on creating an ISO standard (16180), which would clarify the concept of “practical cut-off” (a somewhat gray area of the ’72 COLREG) and govern performance and testing of navigation lights.

An ISO Working Group (ISO TC 188 WG 19) was assigned the project and is made up primarily of American, German and Dutch navigation light manufacturers and testing labs. (There is some confusion about voting rules in this group. It appears that companies get a vote by making, testing or installing navigation lights as an OEM and by showing up.) The drawn out seven-year-old process is the result of ongoing stalemates brought on by differences of opinions between approximately equal numbers of Americans, Germans and Dutch. In the simplest of terms, the Americans want U.S.C.G. A-16, which we use domestically, to be acceptable worldwide. The Germans & Dutch want the Rhine River Commission requirements to be the rule.

Europeans generally develop their own standards (CEN) just as we do. Where possible, they look for them to mirror related ISO standards. But in this case, fearing the ISO standard would be written around U.S.C.G. A-16, the Germans & Dutch developed their own European standard (PR EN 14744) to reflect the rules they wanted.

The differences between the two are significant. If PR EN 14744 is adopted, it is generally thought that lights smaller than about 3 1/2” in diameter by 4 1/2” tall will no longer exist. Along with increasing the size of lights, significant additions and differences in testing would add to an already dramatic increase in cost, and changes in testing parameters would result in significant reductions in lamp life.

So, the stage was set for the ISO working group to meet in Amsterdam the weekend before the METS show to finalize the ISO standard. Unfortunately, more Germans & Dutch showed up than Americans and the seven-year balance was upset in their favor. On a vote, the Rhine River requirements would become the worldwide ISO standard.

Fortunately, the Germans & Dutch had asked several times before the vote was taken to give up and dissolve the ISO Working Group. Recognizing that PR EN 14744 would become the new ISO 16180, the American group took them up on their offer and supported the proposal to dissolve the group – with the additional provision that PR EN 14744 would also be dissolved. Seven years of frustration had apparently taken their toll and the Germans & Dutch essentially agreed.

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There remained a small amount of negotiation before a final deal was struck. But, for all practical purposes, here is the bottom line.

- a. Both the ISO and CEN standards for recreational craft less than 20 meters will include rules that govern only the installation of lights in accordance with the U.S.C.G. A-16 parameters. All regulations covering performance and testing of navigation lights used on these vessels will remain as it was, i.e. countries will maintain their own rules as allowed by COLREGS.
- b. Both working groups will cease work on a “unified standard”.
- c. A European (CEN) standard reflecting the Rhine River Commission guidelines will be implemented in Europe for all commercial vessels regardless of length and for all recreational vessels larger than 20 meters. American manufacturers of boats in this size range should note that lights currently in use might become illegal in the near future and cause a vessel to be stopped at the border.

Note that the potential exists for a backlash from bureaucrats who had been pushing for seven years for the unified standard. The possibility exists that the group will be forced to meet again to try to reach agreement.

Concern over this possibility has encouraged navigation light manufacturers from both sides to agree to meet outside of the larger group to see if a compromise can be reached. The most likely possibility for compromise is to adopt the U.S.C.G A-16 rules for vessels less than 12 meters and the Rhine River regulations for vessels larger than 12 meters. This would allow worldwide use of American style navigation lights on smaller, less expensive boats and German/Dutch style lights on larger boats generally selling for over \$150,000 and used more often at night on commercial waterways.

If you have any questions about the specific details, which were glossed over in this report, please contact either Tom Marhevko at NMMA or me.