RSG Committee Meeting Leuven, Belgium

17-18 April 2018

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 address 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

RCD Administration Topics

Election of Officers

- Chair, RSG Ulrich Heinemann
- Chair CAP Group, Ville Hoglund
- Chair, TI Group, Allister

Rules of Operation

- 13. Will look at adding AdCo as a member of RSG.
- 19. The AdCo Chair or an AdCo representative will be invited to the RSG meetings.
- 37. RSG meeting conference calls will be offered on request, two weeks before the start of the meeting.
- 49. Allowed a vote to be used for PFE acceptance, 75% needed to pass.
- 50. For a PFE vote, if less than 75% positive vote, then PFE is rewritten or withdrawn.
- Deleted all references to DLIs.

RCD Topics

Secretariat Report

• PFEs can now be searched by key words.

Commission Report

- The HAS consultant is no longer involved in ISO standard corrections, but only responsible for guidance to the Commission.
- The Commission-sponsored general database of NB activities is in opposition to some members states required reports.
- NBs are required to participate in the RSG. But who will enforce? Commission can denotify NBs.
- Member states cannot issue DLI (interpretations) to be used by NBs.
- DLIs should be removed from the RSG guidelines. Long discussion on the NBs need for DLI interpretations versus the commission's request to pull all DLIs. Idea to put the DLIs into the

- application guide was rejected. Maybe AdCo will be involved in these DLIs? TBD. DLIs will not be published in the 2018 Guidelines.
- Application Guide will be sent to Commission in June and published soon after. RCD Group will review the Application Guide a year after publishing.
- ISO 8666 still floating around CEN.

ADCO Report

- MIC codes should be listed in the NB report.
- DoC templates for engines and PWC were approved and are on the AdCo website. No translations available yet.
- Discussed when PCA should be used. Should follow article 19 of RCD.

RSG Conformity Assessment Procedures (CAP) Subgroup Topics

PFE's

The following PFEs will be placed in the 2018 Guidelines (as RFUs) and submitted to the RCD Committee.

- PFE 303 Declaring standards for components
- PFE 304 Electrically driven kayaks
- PFE 307 Enter the craft/enter the interior of the craft
- PFE 315 Electrical engines/propulsion engines?
- PFE 318 Hull length/hydrodynamic support
- PFE 264 Weight of liferaft/stowage point
- PFE 321 Fire detection devices

ERFU's/RFU's

The following ERFUs have been endorsed by the RCD Committee for approval.

- ERFU 30 Fuel supply arrangements
- ERFU 93 Small gas cookers
- ERFU 117 Steering wheel families
- ERFU 130 Cookers and stoves
- ERFU 135 Ventilation openings
- ERFU 143 Builders Plate for dinghies
- ERFU 144 Fuel fill openings
- ERFU 148 Electrical fuel senders

The following RFUs have been amended and will be resubmitted to the RCD Committee.

- RFU 122 Engine room insulation material
- RFU 141 RIB design category

RFU's/ERFU's Withdrawn

- RFU 69 Exhaust emissions
- ERFU 25 Fire protection
- ERFU 80 Fuel fill marking
- DLI 19 Product built before 2013

RSG Technical (TI) Subgroup Topics

<u>PFEs</u>

The following PFEs will be placed in the 2018 Guidelines (as RFUs) and submitted to the RCD Committee.

• PFE 300 – Fire detectors

- PFE 306 CO detectors
- PFE 309 RIB stability
- PFE 317 Testing of high speed RIBs

ERFU's/RFU's

The following ERFUs have been endorsed by the RCD Committee for approval.

- ERFU 22 Ear clamps
- ERFU 23 Petrol tank installation
- ERFU 50 Ignition protection of engines
- ERFU 55 Ignition protection of electrical devices
- ERFU 70 Viable means of escape
- ERFU 77 CE marking steering gear
- ERFU 92 Tank families
- ERFU 138 Category A righting curves
- ERFU 139 Defining fixed openings

RFU's/ERFU's Withdrawn

- ERFU 102 Fuel valve sight gauge
- RFU 142 Portable fuel tank

RSG General Issues

- Report of Standardization (HAS Consultant)
 - o Approved as the HAS consultant. Still to assess standards for compliance to the RCD. Annex ZA will be written by the WG and assessed by the HAS consultant. Consultant does not take part in drafting or reviewing the standards. Not yet decided whether to assess the standard at both the draft and final stages. Consultant assessment should now result in a standard being Compliant, Partially compliant with a Notice, or Non-Compliant.
 - Still appears to be against the scope of TC188 standards to be greater than 24m. Concern of standards becoming more complex to satisfy requirements of larger craft.
 - o Concern of revisions that result as wholesale changes of standards that may not be needed.
 - o Standards systematic reviews appear to be taking longer than needed.
 - The RCD is not considered in the review and standards go beyond the requirements of the RCD. Builders Plate standard noted as an example.

• ICOMIA Technical Report

- o ICOMIA maintains a live standards improvements list for the TC188 WG standards reviews.
- o TC 188 2018 Plenary held in Paris in June 2018.
- o New TC 188, SC2 Chair, Pete Chisholm.
- o All ISO standard should purge reference to national laws.
- o ISO activities: boot in January, Plenary in June and METS in November.
- o ISO 9094 fire protection has no transition period!
- o ISO 12215, Part 5 will be going to FDIS soon.
- Steering standards undergoing a merger. An independent steering wheel standard will be created.
- Working on DoC templates.
- o Working on the RCD 2022 amendment.
- o Working on CO poisoning, electric flares, yacht recycling.
- o Producing the quarterly Boat Digest.

RSG Guidelines

o Eliminated unneeded relevant documentation in the RFUs.

Conformity assessment modules

 Added the descriptions of all modules to the RSG Guidelines except for Module G and Module PCA.

PCA

Corrected the Module description and will be inserted in the Guidelines.

NB database

 More NBs are participating in the NB activity database. Proposal to remove the requirement to report components was sent to CAP Group for further discussion.

• Monitoring a product after certification

- RCD (Article 4) requires monitoring all craft with certificates, to remain in conformity. IMCI
 accomplishes by an annual request to every manufacturer and application for a new
 certificate. May or may not need a reassessment.
- Commission noted that all NBs should have a monitoring program. Many NBs do not want to do this.
- Sent back to CAP Group for discussion.

ADCO meeting Issues

- NBs should be involved in ISO standardization since those are the tools of the NB.
 Recommended that NBs be involved at their national level.
- How to monitor a product after certification? NB or AdCo?

Future PFE

For multihulls susceptible to inversion, who determines this, NB or manufacturer? These craft shall have a means to escape. Defined in ISO 12217, Parts 1&2.

The next meetings of the RSG subgroups are scheduled for 10-11 October 2018 in Stockholm, Sweden and 5-6 March 2019 in La Rochelle, France. The next meeting of the RSG Committee is tentatively scheduled for 6-7 May 2019 in Berlin, Germany.

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