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ICOMIA TECHNICAL NOTE:

Implications for boat manufacturers and dealers regarding EU regulations for new and existing types of boat trailers.

This technical note is a revision of a previous version circulated in 2008 and contains updated information with regards to Directive 2007/46/EC as well as new details for the periodic road-worthiness tests for medium to heavy trailers over 3.5t (O3 + O4).

If you import/export, manufacture or sell boat trailers you need to be aware that regulations are currently in force that require all trailers in Europe to be type approved.

Directive 2007/46/EC has been obligatory for new types of trailers since 29th October 2011 and 29th October 2013 for existing types.

Its purpose has been to remove trade barriers for manufacturers and ensure common road safety and environmental standards existing throughout Europe to purchasers and operators of such vehicles.

If you are involved in either the manufacture or sale of trailers, you need to understand how this affects you.

What is EC type-approval of vehicles?

The European approval scheme is based on the concept of 'type approval', which generally assesses the environmental and safety performance of a vehicle without having to inspect and test every single one. At its heart is third-party assessment of compliance with the performance standards outlined in a number of separate EC Directives.

Under the type approval system, a **production sample** is tested. If it passes the tests and the **production arrangements** also pass inspection, then vehicles or components of the same type are approved for production and sale within Europe, without further testing.

The EC type approval scheme is intended for manufacturers that produce large volumes of vehicles each year for export to the European market. The administrative and technical requirements for that scheme are set out in the Directive.

National approval schemes and individual vehicle approval schemes are intended for small and medium sized businesses that build small volumes or single units of vehicles each year **for domestic markets only**. The technical requirements for vehicles using the national schemes are largely the same as those specified for the EC type approval schemes, but the administrative costs of testing and demonstrating compliance should be lower.

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The regulations include very light, light, medium and heavy trailers in categories O₁ - O₄ as follows:

- O₁ very light trailers up to 0.75 t {non-braked or braked (optional)}
- O₂ light trailers over 0.75 t and not more than 3.5 t
- O₃ medium trailers over 3.5 t and not more than 10 t
- O₄ heavy trailers over 10 t

All of these categories cover boat trailers, with O₁ and O₂ in particular affecting the higher volume manufacturers and importers of trailers up to 3.5 tonnes gross weight (in all cases the weights referred to are gross to include the load).

A number of performance requirements will apply to a given vehicle type; technical requirements for trailers are based on 21 Directives, although not all apply in each case, and cover topics such as brakes, lighting, couplings and tyres.

List of requirements for the purpose of EC type-approval of vehicles

Requirement	Directive	Trailer Category
Fuel tanks/rear protective devices	70/221/EEC	O ₁ - O ₄
Rear registration plate space	70/222/EEC	O ₁ - O ₄
Steering effort	70/311/EEC	O ₁ - O ₄
Braking	71/320/EEC	O ₁ - O ₄
Radio interference (electromagnetic compatibility)	72/245/EEC	O ₁ - O ₄
Statutory plates	76/114/EEC	O ₁ - O ₄
Installation of lighting and light signalling devices	76/756/EEC	O ₁ - O ₄
Retro reflectors	76/757/EEC	O ₁ - O ₄
End-outline, front-position (side), rear-position (side), stop, side marker, daytime running lamps	76/758/EEC	O ₁ - O ₄
Direction indicators	76/759/EEC	O ₁ - O ₄
Rear registration plate lamps	76/760/EEC	O ₁ - O ₄
Rear fog lamps	77/538/EEC	O ₁ - O ₄
Reversing lamps	77/539/EEC	O ₁ - O ₄
Heating systems	2001/56/EC	O ₁ - O ₄
Lateral protection	89/297/EEC	O ₃ - O ₄
Spray-suppression systems	91/226/EEC	O ₁ - O ₄
Safety glazing	92/22/EEC	O ₁ - O ₄
Tyres	92/23/EEC	O ₁ - O ₄
Masses and dimensions	97/27/EC	O ₁ - O ₄
Couplings	94/20/EC	O ₁ - O ₄
Vehicles intended for the transport of dangerous goods - The requirements of Directive 98/91/EC are only applicable when the manufacturer applies for the EC type-approval of a vehicle intended for the transport of dangerous goods.	98/91/EC	O ₁ - O ₄

To ensure a consistent approach, the test methodology is outlined in the relevant EC Directive or the ECE Regulations.

Once all of the system and component approvals are in place, the vehicle is then considered as a whole by a designated approval body. This inspection can take place at your facility, providing you have the appropriate equipment and environment. A successful inspection will result in the issue of an EC Type Approval Certificate.

The directive outlines the requirements for this Certificate in its Annex VI. This certification will be accepted throughout the EU without the need for further testing until a standard is updated or your design changes.

Once a vehicle is approved, the manufacturer should have processes in place to produce a Certificate of Conformity (CofC) for each vehicle manufactured. A detailed description on what a CofC must include is given in Annex IX of the Directive.

Conformity of Production (CoP – see Annex X) is part of the approval process. Essentially, this involves the evaluation of your manufacturing processes to ensure that each product is manufactured in accordance with the approved specification.

If you have a formal quality system in place, such as ISO 9001 or ISO/TS 16949, the level of CoP inspection may be reduced.

Certain member states within Europe have different opinions as to whether boat trailers could possibly be considered Special Purpose Vehicles (SPV's) and thus it is recommended that manufacturers first consult with the necessary authorities before declaring them as such.

Periodic road-worthiness tests for trailers – Only medium and heavy trailers (O₃ and O₄) are required to be checked one year after their first registration date and subsequently each year. Certain European Member States may however conduct additional roadworthiness tests if needed.

It is worth noting that the European Commission has indicated it will, within approximately five years, submit to the European Parliament and the Council a report on the effectiveness of the possible inclusion of O₂ light trailers (with a mass exceeding 0.75 tonnes but not exceeding 3.5 tonnes) in the scope.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Patrick Hemp', with a long horizontal stroke extending to the right.

Patrick Hemp

Technical Manager

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