

RSG Subgroup meetings Egham, England

26-27 October 2010

This was a meeting of the Recreational Craft Sectoral Subgroups. The subgroups consist of the Notified Bodies (NB) for the Recreational Craft Directive, and representatives of industry. NMMA is a member of these subgroups. The main objective of the meetings was to deal with issues concerning the applicability of the Amended Recreational Craft Directive.

PFE – Proposal for Inquiry
RFU – Recommendation for Use
IDG – Internet Discussion Document
NB – Notified Body
CEN – European Committee for Standardization
WG – ISO Work Group
PCA – Post Construction Assessment

Two new members in the RSG are from DMV Finland and Bureau Veritas France. Both are Notified Bodies. NKIP from the Netherlands is back on board now under the name of DCI.

RSG Conformity Assessment Procedures (CAP) Subgroup meeting

RCD Revision – DG Enterprises

- Revisions and comments to be received until November.
- Buoyancy and Flotation – All habitable multicraft shall be so designed that it is either not susceptible to inversion or it has sufficient buoyancy to remain afloat in the inverted position. (It was noted that every boat ever built is susceptible to inversion.)
- Engine test cycles and reference fuels were defined.
- Defined engine family and parent engine.
- Test fuel characteristics were created. Allowed for other test fuels to be used as long as they are recognized in a harmonized standard.
- There appears to be a question about whether boats in production and already certified under the old RCD need to be recertified under the new directive. This has to be clarified by the Commission.
- Expect the revised RCD to be issued in 2013.

PFE's

- PFE 233 – It is not enough that information is only in the Table of Contents of an owner's manual but also must be described within the manual. This item was withdrawn as self-explanatory.
- The RSG nominated a small subgroup to work with the Commission's Standing Committee to assist on review and approval of the pending RFUs.
- PFE 236 – A PCA assessment cannot use a previous CE assessment as its basis since there is no guarantee that the boat has not been altered.

Issues of the CAP Subgroup

- The CEN report will be distributed to the US Technical Group.
- The 2011 Guidelines will be published with only minor editorial changes. Changes to the Guidelines are due at the end of January 2011.
- Only harmonized standards will be referenced in the Guidelines.
- The commission corrected an error in the date of conformity of ISO-12217-1 and ISO-12217-3. The older copies of these standards were previously withdrawn and the new revisions were not in place for over a year later, leaving a gap in RCD conformity. In this case, where no harmonized standards are available, the safety requirements of the RCD govern the assessment. In the case where a standard is found not to be complying to the RCD then that standard should be set aside and the certificate should be reassessed to the new standard. The RSG will distribute an information note to all boat builders through ICOMIA and RSG members recommending that builders check their vessel conformity to the new ISO 12217-1 and -3 if they are still building vessels and carrying certificates complying to the old versions of ISO 12217. An RFU was issued informing that a manufacturer may continue to use a superseded standard in a previously assessed vessel even though a revised standard is available.

- From the Commission:
 - Question of model year – already defined in ISO 10087.
 - If an owner changes the boat such as an engine changeout, is the owner required to obtain a new DoC? This is a legal question beyond the scope of the RSG.
 - How does a NB assess exhaust in a PCA? Use a CE engine or leave the engine home. This topic needs a lot of work in the regulatory world.
- The EU is awaiting the arrival of E7 and E10 in their fuel and anticipates the same problems that the US experienced 5 years ago. A RSG subgroup was formed to review the standards available for hose construction and testing allowable for E diesel fuels. David Marlow is the US rep on the subgroup.
- The RSG discussed the lack of transparency of ADCO meetings. A letter from ICOMIA was sent to the Commission requesting improved RSG/ADCO relations.
- The RSG was presented with a marketing paper from a component manufacturer with numerous errors and inaccuracies, noting, among other things, "RSG approval". The first RSG action will be visit the booth of this component maker at METS to discuss and hope to correct their advertising errors.
- IMCI uncovered another false certificate in a PCA assessment completed by another NB. The commission verified that a PCA needs an individual assessment and cannot use a previous CE assessment conducted on a new model. IMCI will submit a PFE to the group on this topic.

RSG Design and Construction Subgroup meeting

PFEs

- PFE 183 - Questions on fireport sizing and sizing of portable fire extinguishers for tank spaces; refer to ISO 9094 WG.
- PFE 197 – Escape hatch; Added the need for fire detection in craft having aft cabins, and added an acceptable distance from a cooker in an escape route.
- PFE 229 – A boat shall designate a main helm position and it shall be fixed.
- PFE 231 – Is the EMC directive applicable to PWC? The commission determined that PWC are held to the EMC directive. The commission also determined that this directive applies to all boats. These determinations were challenged by the RSG who believe that this directive applies to only electronic components. This topic TBD, legal advice was requested from the commission on this matter.
- PFE 232 – Can fuel hoses use a "family" concept when testing fuel hoses? The RSG will consult with Bob White at METS.
- PFE 234 – Does a PWC builder need to provide a document verifying that the engine complies with ISO 13592, back flame arrester? No.
- PFE 235 – Shall integral diesel tanks be tested in the same manner as integral metal tanks? These tanks shall be tested under ISO 10088. This topic should also be addressed in the next revision of ISO 21487.

Issues of the DCN Subgroup

- ISO 11812 has a number of mistakes that will be corrected by the convener at the next meeting of the ISO WG.
- ISO 21487 needed to be amended to revise the melting point requirement of PE fuels tanks from 120 to 150C. Some tanks have already been certified to the lower temperature. The EU commission acknowledged that there is an error in the standard and allows for tanks to be certified to ISO 10088 until the revision of ISO 21487 has been completed and approved.

RSG Exhaust Subgroup meeting

PFEs

- N/A

Issues of the Exhaust Subgroup

- MARPOL has issued Convention Annex VI for exhaust emissions for marine diesel engines over 130kw. These are still non-binding recommendations.

The next meeting of the RSG is tentatively scheduled for April 6-7, 2011 in Brussels, Belgium. The next meeting of the subgroups was tentatively scheduled for February 24-25, 2011 in Rimini, Italy.

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