

RSG Subgroup Meetings
Ferrara, Italy

8-9 March, 2017

This was a meeting of the Recreational Craft Sectoral Subgroups (RSG). 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 New Recreational Craft Directive.

PFE – Proposal for Inquiry

RFU – Recommendation for Use

ERFU – Endorsed Recommendation for Use

ARFU – Approved RFU by the Standing Committee

IDG – Internet Discussion Document

NB – Notified Body

CEN – European Committee for Standardization

WG – ISO Work Group

PCA – Post Construction Assessment

AdCo – Administrative Cooperative working group

In attendance were representatives from Belgium, Sweden, Italy, England, Czechoslovakia, Netherlands, Poland, Finland, Germany, CEN, EU Commission, AdCo, ICOMIA, and NMMA.

RSG Conformity Assessment Procedures (CAP) Subgroup Meeting

Administrative Secretariat Report

- There are 27 Notified Bodies for the new directive 2013/53/EU. Turkey, Greece, Portugal and Bulgaria NBs are not yet notified. Note that there is a Chinese NB (CCS) applied through Greece. Application sent to Commission. Commission does not approve but verifies technical expertise and office location in the EU.
- All RFUs and ERFUs are maintained on the RSG website.

Commission and CEN report

- RFU 139, Fixed openings - has been supported by the Commission.
- RFU 137, Major craft conversion - has been suspended by the Commission.
- Transposition period ended 17 Jan 2017. Half of the member states of the EU have not transposed to the new directive.
- Commission Implementation Regulation applicable 24 January 2017. This act clarified regulations, codified composition of ID number, responsibility for assigning numbers, procedures of assigning numbers. The composition of the number shall be described in the harmonized standard. MIC assigned only by EU/EEA member states. Each member state designates one national authority for this assignment. All MICs are listed in the national register. All national registers are available in CIRCABC. All third countries MICs are listed in a general third country database. This will, hopefully, eliminate assignment of same MICs.

PFE's

- PFE 115, Component labelling - Are all shift and throttle systems (control heads/joysticks) in one device considered to be Annex II steering components? No, unless they can be used for steering.
- PFE 265, Component labelling - This will now correctly reference a revised PFE 115.
- PFE 303, Declaring standards of components – This PFE recommends that component standards used by the boat manufacturer should be listed on the DoC. This question may be outside the scope of the RSG and will be sent to AdCo for an answer.

- PFE 304, Electrically driven kayaks, propulsion engine – Electrical engines are outside the scope of the directive for emissions, but are considered a means of propulsion so the craft with these engines is within the scope of the RCD.
- PFE 305, PCA and builder’s plates – Old plate must be removed or marked invalid.
- PFE 307, Enter the craft/Enter the interior of the craft – The PFE tries to differentiate these terms and also gives a listing where these terms are used. This PFE will be used until TC188 defines these terms. (TC188 action: ISO 8666)
- PFE 308, Electric provisions to determine the fuel level – Non sparking electrical components are required to be CE marked as an Annex II component if they are installed in a petrol tank or petrol engine space. Action: ICOMIA to submit comment to whether batteries are considered Annex II components.
- PFE 310, Applicants for PFEs – Withdrawn, question is covered in the RCD.
- PFE 311, Start in gear protection devices/Electric outboard engines – Withdrawn. The larger question is whether electric outboard engines are covered by the RCD. The PFE was rewritten to state that electric propulsion engines are covered by the RCD.

Issues of the CAP Subgroup

- Database of Authorized Products – Available on the RSG website. Lists of issued certificates. Input required by all NBS. Currently only has IMCI input.
- RSG Contract minimum content – RSG chair asked the RSG to look at developing a standard contract for NB use, using the IMCI contracts as a baseline draft.
- RCD 2013/53/EU, Reference to 97/68/EU – Off-road machinery direction no longer applicable as it has been replaced by an EU decision.
- RSG guidelines
 - Conformity assessment modules in RSG Guidelines – All RSG module descriptions are being rewritten to RCD2.
Note1: Commission stated that PCA engines must follow RCD2 requirements, i.e., A PCA craft needs a new engine. End of PCA? Stay tuned.
Note2: A NB said that RCD2 engines have tougher emission limits than California. (!)
 - “Recreational Craft Directive” to “Watercraft Directive” – RCD is changing to WD and RSG changing to WSG. To be decided at the RSG meeting in April.
 - PCA information for engines test limit equivalents need to be defined by the Commission.

RSG Technical Issues (TI) Subgroup meeting

PFEs

- PFE 293, Major craft conversion – A major craft conversion requiring a reassessment of the craft can happen with a physical craft change or with just a change in maximum capacity.
- PFE 300, Fire detectors – Will try to amend ISO 9094 prior to RSG addressing the question of where to locate fire and heat detection systems. (NMMA Action)
- PFE 306, CO detection systems – Not needed since not an RCD2 requirement. Still an RSG recommendation.
- PFE 309, Stability of RIBS – A cockpit of a RIB is considered a recess.
- PFE 312, LPG/LNG – Withdrawn; Conversions to LPG or LNG is always a major craft conversion. Revised RFU 132.
- PFE 313, LNG – Withdrawn; send to ICOMIA ISO improvement list for NWIP consideration.
- PFE 314, Major craft conversion – This PFE listed every possible system that would define a major craft conversion. Totally too many unneeded requirements for the industry. RSG Working Group created to address the details presented in the PFE. Heinemann, Hemp, Marlow, Reay, Hoglund, Bergstrom.

The next meeting of the RSG is tentatively scheduled for April 2017 in Belgium. A PCA meeting is needed before the RSG meeting to resolve all the PCA and engine issues raised at this meeting. The PCA meeting will be held 19 April 2017, 9-12 in Belgium. The next meeting of the subgroups was tentatively scheduled for 26-27 September 2017 in Naples, Italy.

The information contained herein is prepared by an NMMA appointed representative or staff member and intended for informational purposes and informal background use only. It is not intended to serve as an official report of the meeting's proceedings, actions or outcomes. This unofficial summary prepared by an NMMA appointed representative or staff member is not intended to generate any action on the part of any reader. The only recognized official transcript of any RSG meeting is the official minutes of the meeting generated by the meeting's convener or sponsor.