

Common rules and standards for ship inspection and survey organisations. Recast

2005/0237B(COD) - 31/07/2015 - Follow-up document

The Commission's report reviews the implementation, by the Recognised Organisations, of Article 10 (1) of Regulation (EC) N° 391/2009 regarding harmonisation of their rules and procedures and setting up a system of mutual recognition of their class certificates for equipment, materials and components. The report is based on an independent study.

At this stage, the report draws the following **general conclusions**:

Conformity with Union Regulation: the mutual recognition scheme developed by EU recognised organisations is compliant with the EU Regulation **although its scope is still limited and should be further developed**. Manufacturers criticise the application process for mutual recognition certificates as not yet completely streamlined.

Coexistence of certificates: existing experience, which is very limited, shows that component suppliers still apply for individual certificates and additionally the mutual recognition certificate. At present **mutual recognition certificates co-exist with individual Type Approval certificates for the same products**. Recognised organisations should consider simplifying the procedures for mutual recognition Certificates in appropriate cases so that their costs become more competitive and individual certificates might be phased out.

On-going issues:

Compliance with safety requirements: by following the same risk based approach used by EU recognised organisations including the strictest technical requirements for all products belonging to the 3rd safety criticality level, **the mutual recognition scheme appears to be compliant with safety considerations**. Still, there is **room for expansion** of the mutual recognition certification scheme to cover a broader range of marine equipment products (e.g. more complex products or materials) under different safety criticality levels.

Involvement of stakeholders: the report stresses that the marine equipment industry is involved in the mutual recognition certification process only to **a limited extent**. On one hand, big original equipment manufacturers (OEMs) are more involved in the mutual recognition process due to their own interest, but on the other hand, smaller OEMs are not as well informed or involved.

A range of stakeholders shares the view that **there is lack of or limited information available**. The Commission considers that additional information and dissemination of information could improve awareness and participation in the mutual recognition certification scheme.

End-user involvement: industry stakeholders within the EU appear to be more active in terms of participation in the EU recognised organisations consultation process but **global industry could ensure higher involvement in the future**. Out of 7 manufacturers already using the new mutual recognition Certificate for some of their products, 3 have their headquarters outside EU (i.e. USA, Taiwan and South Korea).

Voluntary international acceptance is the most important target for which to aim: dialogue between industry representatives as well as between relevant public authorities may increase understanding and acceptance of the mutual recognition certification scheme outside the EU.

Costs and administrative burden: the report notes that at present there is a **lack of transparency concerning the cost of acquiring a mutual recognition certificate**. When witnessed testing is required for the latter, the cost is often considered overwhelming (especially for SMEs).

Furthermore, the preliminary data from the independent study demonstrate that the amount of time needed to acquire a mutual recognition certificate varies a lot (from 6 months up to 2 years) depending on the product in question and the complexity of the overall process (i.e. administrative burden).

Additional considerations: the report states that it is not clear at this juncture whether EU recognised organisations will manage to elaborate requirements for mutual recognition certifications for more complex products in the near future. Equipment manufacturers are eager to propose a list of possible new products with higher safety criticality.

Dissemination events (e.g. workshops, seminars, etc.) in combination with wider distribution of existing information on the technical requirements of the eligible products for the mutual recognition scheme to a larger proportion of stakeholders with different industry interests could be envisaged to enlarge the outreach of the mutual recognition scheme to a wider audience.