



Regelverk - RCD I & II Båtprodusenter og CE-merking

Olaf Hjelmeland – CE-inspector IMCI



- **Teknisk kontrollorgan (akkreditering BELAC)**
- **38 inspektører i 22 land, eksamineres hvert 3. år**
- **1500 produsenter og 8000 båtmodeller (sertifikat)**
- **Utført sertifisering for 60 produsenter i Norge.**
- **Tilsyn i Norge: 390 båter fra 3. land (USA)**
- **PCA I Norge: 330 båter (USA / Norge). Mye “grums”**
- **Ved sertifisering – Sertifikat og faktura fra Brussel**
- **Ved veiledning – Ikke via Brussel**



RCD I – 94/25/EC (2003/44/EC)

RCD II -2013/53/EU

- **RCD II blir obligatorisk fra 18. januar 2016 og erstatter RCD I fra 1998. Overgangsperiode på 2 år. (18.1.2017)**
- **Hva med Nordisk Båtstandard 1990. Var en frivillig ordning og utfaset etterhvert som standarder ble harmonisert.**



RCD II

Hvorfor

- **Forenkling og tilpassing til andre regulerte områder i EU**
- **Eksosutslipp**
- **Innføre begrepet økonomisk operatør**
- **Innføre begrepet privat importør**
- **Større krav til tekniske kontrollorgan (Notified Bodies)**
- **Forpliktelse for nasjonal overvåkning**



RCD II

- **Grunnleggende krav refererer ikke til harmoniserte standarder lenger.**
- ***However the **use of the harmonised standard** is still maintained as the preferred route for a **presumption of conformity** to the Directive***



RCD II

- **Title of Directive changed to “Directive on recreational craft *and personal watercraft*” This better reflects the scope of the Directive**
- **Covering now also partly completed personal watercraft**



New RCD

- **Exclusion of “canoes and kayaks” being propelled by hand paddle power only**
- **Added exclusion of “amphibious craft” (i.e. wheeled or track-laying motor vehicles, which are able to operate both on water and on solid land)**
- **New definition “watercraft” being any recreational craft or personal watercraft**
- **Definitions for “recall” and “withdrawal” added**



RCD II

- **“economic operator”** being the manufacturer, authorised representative, importer or distributor
- **“importers”** means any natural or legal person established within the Union who places a product from a third country on the Union market
- **“private importer”** means any natural or legal person established within the Union who imports in the course of a **non-commercial activity** a product from a third country into the Union with the intention of **putting it into service for his own use**



RCD II

- The term ‘Community market’ is replaced by “Union market”
- Annex II components will need an Owner’s Manual
- Importers and manufacturers shall indicate their name, registered trade name or registered trade mark and the address at which they can be contacted on the product



RCD II

- **Enlarge the obligation to affix the CE-marking also to all inboard engines and stern drive engines **without** integral exhaust meeting the essential requirements**
- **Do It Yourself craft placed on the market before the end of the 5 year period **shall apply the Post Construction Assessment** procedure**





RCD II

- The reference boat concept for noise emissions is deleted
- Means of reboarding shall be accessible to or deployable by a person in the water unaided



RCD II

- **No ventilation required any more for Diesel tank spaces**
- **Tiller-controlled OB need emergency stopping device**
- **Electric propulsion circuits shall not interact with other circuits in such a way that either would fail to operate as intended**



RCD II

- Requirement for each gas appliance to be equipped with a flame failure device effective on all burners **was deleted**
- Any toilet fitted in a recreational craft shall be connected solely to a holding tank system or water treatment system
- Declaration according to Annex III b (partly completed components) **was deleted**



RCD II

- **“Builder’s plate” (ER 2.3) shall now show (if available) the registered trade mark or trade name in addition to manufacturer’s name and address**
- **“Visibility from the main steering position” (ER 2.4)
For ~~motor boats~~ **recreational craft**, the main steering position shall give the operator, under normal conditions of use (speed and load), good all-round visibility.**



RCD II

- **“Insulating materials” (ER 5.1.1) in engine rooms shall **not sustain combustion** (changed from ‘*non-combustible*)**
- **“Exhaust emission requirements” New limits for NOx, HC, PT align with US EPA standards, with relaxation of CO limits**



RCD II

- **Module descriptions were, with exceptions, taken out of the new RCD in principle**
- **Modules aligned with NLF with supplementary requirements. Former module “Aa” becomes module “A1”**





RCD II

- **“Post-Construction Assessment”** **New module** for PCA for equivalent conformity assessment when neither the manufacturer nor his authorised representative has assumed the responsibility for the product’s conformity
- PCA applies to **craft and components** for **private importers only, major modification or change of intended use** to bring craft within scope of the Directive



RCD II

- **“Formal non-compliance” may result in recall or prohibition of use if**
 - the conformity marking has not been affixed or has been affixed illegally
 - the EU declaration of conformity has not been drawn up or has not been drawn up correctly
 - the technical documentation is either not available or not complete



RCD II

Spørsmål til Sjøfartsdirektoratet:

- **Når blir det veiledet om den nye RCD II og på norsk språk?**



Båtprodusenter og CE-merking

- **Båter under 12 meter i kategori C kan CE-merkes uten medvirkning fra teknisk kontrollorgan, unntak hvis båten må støymåles. (“Selvsertifisering”, et merkelig begrep).**
- **Frivillig å sertifisere etter en høyere modul, de fleste velger billigste vei.**
- **Å skrive under på samsvarserklæring medfører at en i det minste har gjeldende ISO standard.**



Båtprodusenter og CE-merking

- **Manglende tilsyn gjennom mange år er konkurransevridende. “Lønne seg å ta snarvveier”.**
- **Tilsyn må ikke bare se på produsentskilt, CIN nr., samsvarserklæring og brukerveiledning. Hva ligger bak.**
- **Regelverket er komplisert, det positive er at det er obligatorisk. Mange prøver oppriktig å gjøre tingene rett.**



Båtprodusenter og CE-merking

- **Det er ikke lett å veilede en grunder i Nord-Trøndelag, eller andre steder, som starter opp med produksjon av båt, eksempelvis i aluminium.**
- **Jeg har utarbeidet enkel veiledning for test av stabilitet (men gjør oppmerksom på at den ikke erstatter ISO 12217-3).**
- **Vedkommende nordtrønder rigget til prøvebasseng i produksjonslokalene. I telefon sier han: “båten staup”. Dette var lærerikt.**



Takk for meg

