



EU RO Mutual Recognition Group Newsletter

Issue No. 4 – July 2015

A Word from the Advisory Board Chair



Sergey
Tolmachev

On behalf of the EU RO Mutual Recognition Group, I am pleased to present the fourth edition of our newsletter. The aim of the newsletter is to keep stakeholders, as well as those with a general interest in article 10.1 of Regulation (EC) 391/2009, informed about the progress being made by the EU RO's towards effective implementation of mutual recognition.

Since our last newsletter in January 2015, the EU RO MR Group has made a number of important steps in the implementation process and has seen good progress made towards fulfilling the requirements of the article 10.1. You will find more detailed information on our recent achievements in the main body of this newsletter, but some of the issues deserve particular attention here:

- **Maintenance of existing MR technical Requirements:** In April 2015 we released the revised technical requirements for tiers 1-3 based on the feedback that was received from our Industry partners and as a result of another successful implementation of the maintenance process for 2014/2015;
 - **Release of new Tier 4 MR Technical Requirements:** Another major achievement was the release of Tier 4 MR Technical Requirements for 10 new products on 1 July 2015. The EU ROs are now offering MR type approval certification for a total of 44 products and work on the next tier of products (Tier 5) has already commenced under the leadership of our Technical Committee Chairman, Lee Woon-ho;
 - **Inaugural Technical Review Meeting (TRM):** In April 2015 we held our first TRM with Industry associations and marine equipment manufacturers in St Petersburg. It was seen as a very important step in promoting cooperation with Industry at a technical level, and for making the procedure for the selection of new products for future tiers more transparent. The TRM was also a good opportunity for Industry to provide direct technical feedback to both existing and draft MR TRs;
 - **Continuous Improvement:** The EU RO MR Group is proactively working on the improvement and evolution of the MR scheme and its associated processes. Two new processes have been developed and put into operation i.e. the "request for clarification (RfC)" "and alert system". The first one, where the title speaks for itself, aims at facilitating the handling of queries on MR technical requirements in order to ensure that the external query is channeled properly and the initiator is provided with appropriate reply. The second is the "alert system", which is a specific process to facilitate compliance with paragraph 3 of the article 10.1 i.e. to share among EU ROs the information about cases when a mutually recognized product is not in compliance with the MR certificate;
 - **Website:** We are working to improve the way in which online information about MR is presented to stakeholders and interested parties, and we recently launched a new Frequently Asked Questions (FAQ) page that will provide answers to common questions and help users navigate the various information sources found on the website. The FAQ page very much 'work in progress' and further feedback and questions are welcome!
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- **Workshop on implementation of the Regulation 391/2009 EC:** Another important milestone for the EU RO MR Group is the release of the Commission’s Report on article 10.1, which is expected soon. To assist with the preparations of this final report, a small delegation from the EU RO MR Group participated in the Workshop on implementation of the Regulation 391/2009 EC, organized by the European Commission in Brussels on 15 June 2015. The EU RO MR Group presented the status of the MR scheme and, in the run up to the final report being presented to the European Parliament, the Group remains in close contact with the EC DG MOVE to enable us to provide the commission with any further information or clarification.

As we wait for this final report from the EC DG MOVE, I would like to take this opportunity to thank all the representatives from the EU ROs for the substantial contribution, effort and resources they have provided to the EU RO MR Group. The visible aspects of the MR scheme is like the tip of an enormous iceberg, and what goes unseen ‘below the surface’ is the immense amount of work that has gone into the implementation process by all EU RO MR Group members. Special appreciation is given to our Secretary, Cassandra Kelly, for overseeing the complex task of ensuring 11 competing EU ROs work effectively together.

Finally, this is the last ‘**A Word from the Advisory Board Chair**’ from me before the Chairmanship is handed over to ClassNk in 2016 and I trust you will find the content of this newsletter useful and informative. As always, the EU RO MR Group remains open for communication and questions and a fifth issue of the newsletter will be released in January 2016. Previous issues can be found here: <http://www.euomr.org/stakeholder-relations>

Regards,

Sergey Tolmachev,
Advisory Board Chairman for 2015

Inaugural Technical Review Meeting held in St Petersburg on 21 April 2015



The EU RO MR Technical Committee & Industry Representatives in St Petersburg

On 21 April 2015 the EU RO MR Group held its inaugural Mutual Recognition Technical Review Meeting (MR TRM) at the offices of Russian Maritime Register of Shipping in St Petersburg.

Based on an agreement with SEA Europe, the aim of the MR TRM was to present the current status of the MR Technical Requirement (MR TR) development and maintenance process and collect feedback on relevant technical issues. It therefore was another opportunity for industry to provide direct input for future prioritising of MR TR development.

The discussions at the MR TRM on 21 April 2015 covered a wide range of topics relating to the development of new Technical Requirements for products suitable for MR and maintenance of existing TRs and many of the issues raised were of specific interest to certain industry associations and manufacturers as noted in the records of the day’s events.

The main points drawn from the recorded outcomes can be summarised as follows:

- Participants agreed that communication between EU RO MR Group and Industry concerning technical decisions taken by the EU RO MR Group during its MR TR development and maintenance process has to be extended;
- The EU RO MR Group’s approach to selecting and rejecting products for MR TR development requires more transparency, and it was emphasized that providing an opportunity for industry input for future prioritising of products for MR TR development is very important;

- The ambit of the EU RO MR Group in relation to article 10.1 of regulation (EC) 391/2009; particularly with regard to different requirements (statutory and class) has to be further discussed and defined more clearly.

Overall, the feeling expressed by those attending the MR TRM was that it had been another successful step in the right direction to a more open and collaborative approach to the implementation of Mutual Recognition for type approval certification. Industry participants found the information provided useful and appreciated the opportunity to discuss technical feedback and ask questions.



There were open and frank discussions about the technical elements of mutual recognition, with some constructive actions identified, which will provide improvements in the MR TR development and maintenance processes going forward.

It was suggested that the MR TRM should be an annual event to continue the good collaboration experienced in St Petersburg and the EU RO MR Group will remain open to holding separate discussions with its stakeholders, as necessary, to address specific issues.

An update will be given on the progress made on addressing the specific actions identified at TRM in April 2015 in issue no. 5 of the Group's newsletter due out in January 2016.

In the meantime, for more information on future MR TRMs, or mutual recognition in general, please contact the EU RO MR Group Secretariat: <http://www.euomr.org/contact-us>

New Mutual Recognition FAQ Page

The EU RO MR Group recently created a Frequently Asked Questions (FAQs) page on its website to address the questions that stakeholders are regularly asking about MR using the most up-to-date information and providing definitive answers that are written clearly and consistently without impinging on individual class societies' sovereignty. The overall aim of the FAQ page is to help users navigate the information that's available on MR within its various reports and guidance documents found online.



The FAQ page can be accessed here: <http://www.euomr.org/faqs> and will be regularly updated and maintained by the Secretariat to ensure continued accuracy and relevance.

The page is still in its early stages and more questions and answers will be added over time. Therefore, we actively encourage all stakeholders to contact us with questions or comments about MR: <http://www.euomr.org/contact-us>

Tier 4 MR Technical Requirements Now Available

On 1 July 2015 the EU RO Mutual Recognition Group issued Supplement No. 3 to the EU RO's First Report to the EU Commission and the Member States. The original report was issued in October 2012.

Supplement No.3 contains uncontrolled versions the MR technical requirements for the additional 10 Tier 4 type approved products (see adjacent table) under the Mutual Recognition (MR) scheme as well as the updated technical requirements for products in existing Tiers 1-3.

The EU ROs developed these MR technical requirements by comparing requirements for type approval across the 11 class societies, selecting products that had common or near common requirements, and collectively agreeing on the most demanding and rigorous standards for the selected products as required by Regulation 391/2009 article 10.1.

Tier 4 Products
Circuit Breakers with Electronic Devices
Contactors with Electronic Devices
Tachometers
Temperature Gauges & Transmitters
Thermal Insulation of Organic Foams for Piping
Valves for Bilge Systems
Valves for Freshwater Systems
Valves for Lubricating Oil & Hydraulic Oil Systems
Valves for Sanitary Systems
Valves for Seawater Systems

Important Notes:

- A copy of Supplement No. 3 can be found here: <http://www.euomr.org/stakeholder-relations>;
- Controlled versions of the agreed MR Technical Requirements can be found here: <http://www.euomr.org/technical-requirements>.

Tier 5 Development Underway

The EU RO MR Group is pleased to announce that a fifth tier of technical requirements (Tier 5) is currently under development and is scheduled for release on **1 July 2016**.

Further details of the products to be included in Tier 5 will be published on <http://www.euomr.org/tr-development> towards the end of 2015.

MR Technical Requirement Development - Progress to Date (2010 to 2015)

Since 2010, the EU RO MR Group has issued agreed Technical Requirements and procedures for Mutual Recognition for a total of **44 type approved products** (Tiers 1 to 4) and it is the group's Technical Committee that is responsible for developing the Technical Requirements and related procedures.

The Technical Committee is also responsible for the group's Product Consideration Process, which facilitates the identification of appropriate products eligible for Mutual Recognition (as well as those that are not suitable) and reporting these decisions back to the Advisory Board for communicating outwards to stakeholders.

The EU RO MR Group recently included details of its Product Consideration Process on its website (see example in **figure 1** below).

"Product Consideration Process"

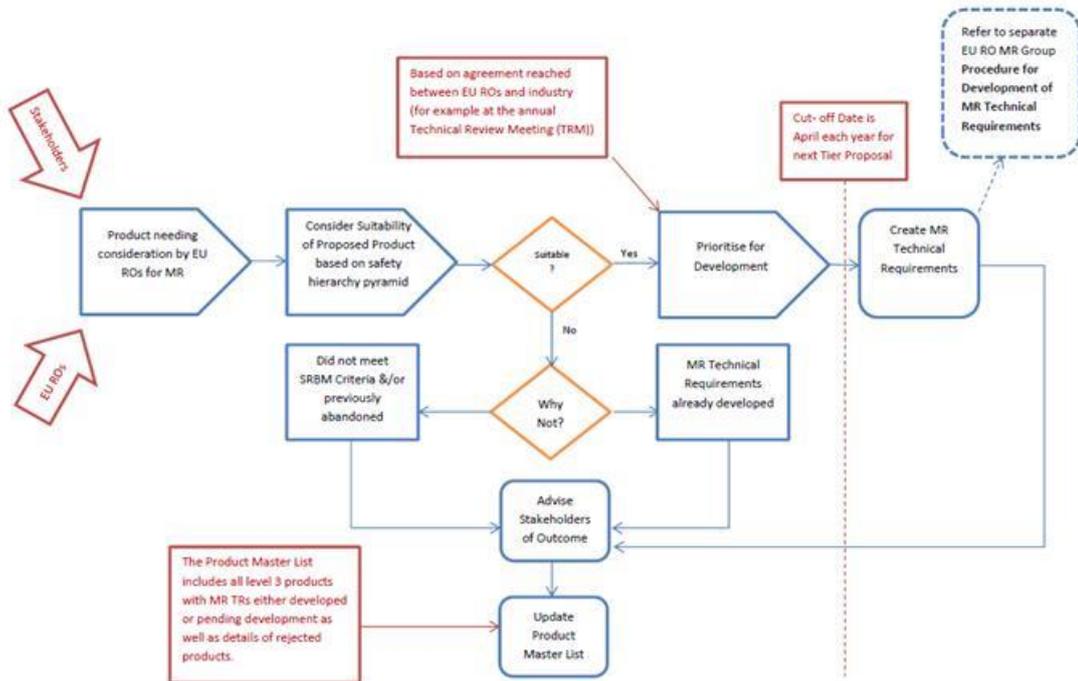


Figure 1 EU RO MR Product Consideration Process

The main criteria for consideration of a product for mutual recognition is that the product must be subject to type approval because this is where direct class involvement begins (i.e. level 3 of the Safety Hierarchy Pyramid as per figure 2 below). The level 3 category of the class safety hierarchy consists of equipment that is considered to have a low safety criticality and type approval certificates alone suffice for its acceptance. Products in this category are typically those produced in series or mass produced for the shelf and are found in the lower safety criticality level of the Safety Hierarchy Pyramid. And for this type of equipment, where there are large production series with consistent production, there is no requirement for class to witness the production or to test each unit in order to approve it, which is why the EU ROs have decided to apply Mutual Recognition to equipment within this category.

"Class Safety Hierarchy"



Figure 2 Safety Hierarchy Pyramid

Since the first set of Tier 1 MR technical requirements were released in January 2013, the Technical Committee has adopted a method of continual improvement for its development process and this has resulted in the reduced lead time between the initial product identification and the final release of the agreed MR technical requirements, as demonstrated in **figure 3** below:

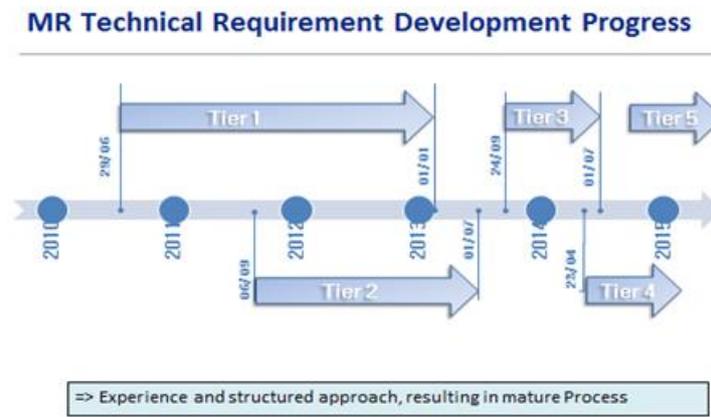


Figure 3 Tier development timeline

With the recent release of the 10 Tier 4 MR technical requirements on 1 July 2015, the EU RO MR Group can confirm that approximately 50% of the \approx 85 to 100 suitable type approved products (i.e. those products that fall into level 3 of the Safety Pyramid in figure 2) are covered by the mutual recognition scheme. The forthcoming release of Tier 5 in July 2016 will bring this figure up to \approx 55 products or approximately 65% coverage as per **figure 4** below:

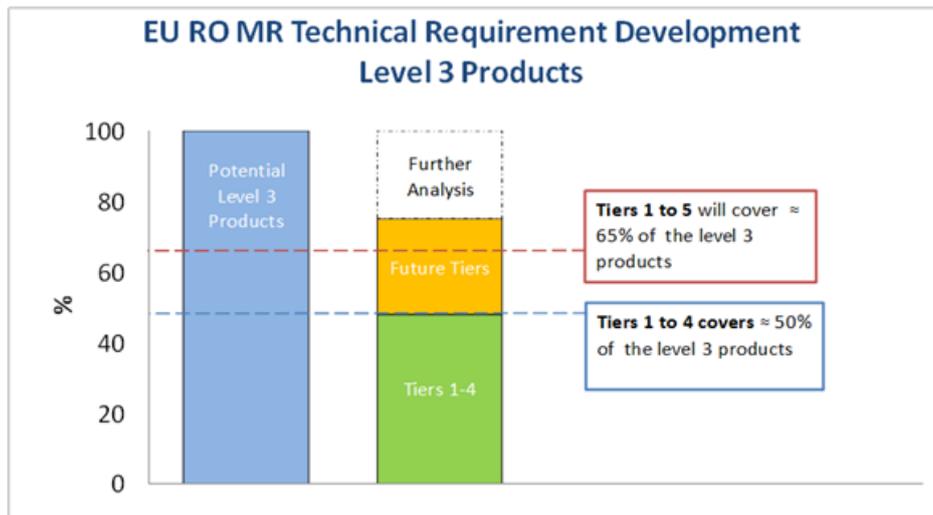


Figure 4 - % of Type Approved Products to be covered by MR Scheme

For further details on the MR technical requirement development process, please see: <http://www.euromr.org/tr-development>.

Revised Tier 1, 2 and 3 Technical Requirements Released on 17 April 2015

Based on feedback received from industry at the Technical Review Meeting in April 2015, the **EU RO MR Maintenance Process** has been updated to ensure that technical decisions taken by EU RO MR Group are communicated back to the initiator and/or relevant industry representatives.

Details of this revised EU RO MR Maintenance Process can be seen in **figure 5** below and can be found in Appendix VIII the EU RO Framework Document for Mutual Recognition of Type Approval and also on the website: <http://www.euomr.org/technical-requirements>.

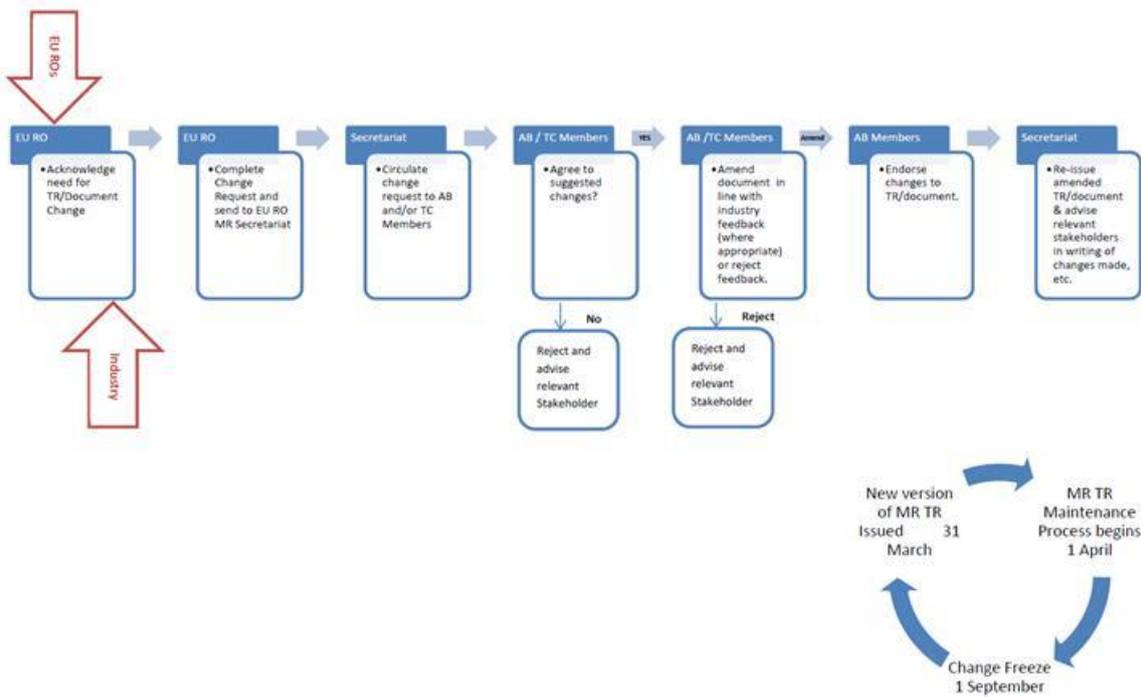


Figure 5 EU RO MR Maintenance Process

Revised Tier 1, 2 and 3 MR Technical Requirements were released on 17 April 2015 and the changes were the result of the consideration of 6 separate items of feedback provided by both industry and the EU ROs since 1 April 2014 (see **figure 6** below). The majority of the feedback received was either editorial in nature or improvements proposed by both the EU ROs and industry.

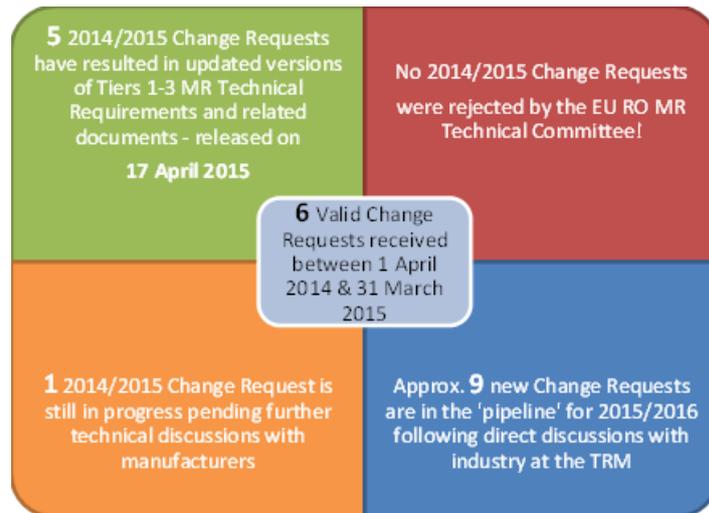


Figure 6 Summary of Change Requests 2014/2015

Further details on how to request a change to or clarification of MR technical requirements be found in the article below entitled 'Requesting Changes or Clarification of MR Technical Requirements (MR TRs) and Related Documentation'.



Changes to the 'Framework Document for Mutual Recognition of Type Approval' from 1 July 2015

Version 4.0 of the 'EU RO Framework Document for the Mutual Recognition of Type Approval' was issued on 1 July 2015 and aims to ensure consistency in the EU RO Mutual Recognition Type Approval process and contains the latest agreed Terms and Conditions for MR. A copy can be viewed on our website:

<http://www.euromr.org/Guidance%20for%20Mutual%20Recognition>

Version 4.0 of the 'EU RO Framework Document for the Mutual Recognition of Type Approval' contains updated terms and conditions as well as details of the following processes adopted by the EU RO MR Group:

- **The EU RO MR Design Evaluation** involving Engineering evaluation and Witnessing of manufacturing and testing processes;
- **The EU RO MR Production Quality Assurance (PQA)** which aims to ensure the consistency of production with the approved design and manufacturing process;
- **The EU RO MR Maintenance Process** which aims to ensure all changes to EU RO MR Documentation go through the appropriate review and approval process; consulting with industry where necessary
- **Request for Clarification (RfC)** which aims to facilitate the handling of queries on MR technical requirements in order to ensure that the external query is dealt with effectively and the initiator is provided with appropriate reply;
- **EU RO MR Material, Equipment & Component Non-Compliance ('Alert System')** process.

Version 4.0 of the 'EU RO Framework Document for the Mutual Recognition of Type Approval' supersedes all previous versions as well as the following referenced documents and annexes within the 'Mutual Recognition within ship classification' First Report to the European Commission and the Member States, Oct 2012:

- 12.2 EU Recognised Organisations (EU ROs);
- 12.5 EU RO Mutual Recognition for Type Approval Terms and Conditions;
- 12.6 EU RO Mutual Recognition Procedure for Type Approval (including annexes).

Requesting Changes or Clarification of MR Technical Requirements (MR TRs) and Related Documentation



Change Requests for the agreed MR Technical Requirements (MR TRs) and related documents should be made in writing to secretariat@euomr.org using the appropriate feedback form found on the website: <http://www.euomr.org/technical-requirements>

Change Requests include (but are not limited to) test requirement updates, rule changes or industry feedback and can vary in significance from a simple editorial change to a technical parameter or test change that requires industry consultation. Amendments and revisions to the agreed MR Technical Requirements (MR TRs) are endorsed (where appropriate) by the EU RO MR advisory Board and are re-issued around March/April each year.

Here is a list of information to include in a Change Request:

- The completed feedback form, including the name of the TR the change refers to and your contact details;
- A description of the nature of change and, if possible, a marked up copy of the changes to the TR should accompany the feedback form;
- A description in the comments section of the feedback form giving the rationale behind the change request (e.g. test requirement update, rule change, industry feedback, etc.);
- In summary: the more information provided, the better!

Based on feedback received from industry at the Technical Review Meeting in April 2015, **the EU RO MR Maintenance Process** has been updated to ensure that technical decisions taken by EU RO MR Group are communicated back to the relevant industry representatives. Details of this revised EU RO MR Maintenance Process can be found in Appendix VIII the EU RO Framework Document for Mutual Recognition of Type Approval and also on the website: <http://www.euomr.org/technical-requirements>.

A **Request for Clarification (RfC) process** has been established since July 2014 for the purpose of unique understanding of the agreed MR TRs (and other EU RO MR documentation) and such requests should be made in writing to secretariat@euomr.org.

Further details of the RfC Process can be found in appendix IX of the EU RO Framework Document for Mutual Recognition of Type Approval: <http://www.euomr.org/Guidance%20for%20Mutual%20Recognition>

EU RO MR Material, Equipment & Component Non-Compliance ('Alert System')

In 2014 the EU RO MR group published details of its 'Alert System' to ensure that all EU ROs are informed if and when a mutually recognised product is not in compliance with its MR type approval certificate.

Regulation (EC) 391/2009 article 10.1 paragraph 3 states:



'Where a recognised organisation ascertains by inspection or otherwise that material, a piece of equipment or a component is not in compliance with its certificate, that organisation may refuse to authorise the placing on board of that material, piece of equipment or component. The recognised organisation shall immediately inform the other recognised organisations, stating the reasons for its refusal.'

The EU RO that receives the notification of a potential non-compliant situation shall verify the details with the EU RO that has issued the certificate before completing the Certificate Non-Compliance (CNC) Form and sending it to the EU RO MR Group Secretariat for onward communication to all EU ROs.

It has been agreed that all EU ROs shall advise their relevant internal stakeholders using their own communication processes and channels as soon as possible after notification of the non-compliant situation.

The root cause of the non-compliance will be investigated and further communication about corrective actions taken and, where applicable, the new certificate’s details will be communicated to all EU ROs. Details of any non-compliant Material, Equipment & Components will then be made available on www.euomr.org/links-to-mr-certificates.

Further information on the ‘Alert Process’ can be found in Appendix X of the EU RO Framework Document for Mutual Recognition of Type Approval: <http://www.euomr.org/Guidance%20for%20Mutual%20Recognition>

Contact the EU RO MR Group Secretariat



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EU RO MR Group Events

Date	Event
1 July 2015	Release of Tier 4 Technical Requirements & Version 4.0 of the Framework Document for the Mutual Recognition of Type Approval
1 July 2015	Commencement of Tier 5 Development Project
August/September 2015	DGMove to issue their Report on article 10.1 to the European Parliament
November 2015	TC & AB Meetings in St Petersburg
December 2015	Start of Tier 5 Industry Consultation Phase
1 January 2016	Handover to new MR Advisory Board Chairman (NK)
January 2016	Next issue of EU RO MR Group Newsletter

Contact the EU ROs

1. ABS – www.eagle.org
2. BV – www.veristar.com
3. CCS – <http://www.ccs.org.cn/ccswzen/>
4. CRS – <http://www.crs.hr>
5. DNV GL – www.dnvgl.com
6. KR – www.krs.co.kr
7. LR – www.lr.org
8. NK – www.classnk.or.jp
9. PRS – www.prs.pl
10. RINA – www.rina.org/en
11. RS – www.rs-class.org/en



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