



EU RO Mutual Recognition Group Newsletter

Issue No. 9 – July 2019

A Word from the Steering Committee Chair



Welcome to Issue No. 9 of the EU RO MR Group Newsletter.

I am pleased to introduce myself as the new Chair of the EU RO MR Steering Committee for 2019. I have taken over on 01 January 2019.

PRS takes over the EU RO MR Group's lead in the 10th year of the implementation by the EU ROs of Article 10.1 regarding harmonisation of the rules and procedures and setting up a system of Mutual Recognition (MR) of certificates pursuant to the provision of Regulation (EC) 391/2009. The EU ROs are now offering MR type approval certification for a total of 70 products (Tier 1-7). The Technical Requirements for the 7th Tier of products entered into force on 1 July 2019.

It has always been important to the EU RO MR Group to exchange with key stakeholders of Mutual Recognition. In September 2018, all interested stakeholders (manufacturers, ship-owners, insurers, flag Administrations, the regulator and other interested parties) were invited to a workshop during SMM in Hamburg to enter into a dialogue on the experience with MR so far and on future developments. The dialogue was appreciated, and further discussions took place and have been planned for the months to come.

Since 15 May 2019, the newly developed risk model providing transparent technical justification for products to enter into the MR scheme, called the Product Evaluation Process (PEP), is open for industry consultation. PEP is based on the classification rules of the 12 EU ROs. All interested parties are invited to test the model and provide comments. An instruction manual and guiding questions support the test application of the model. The MR Group is looking forward to receiving comments for further consideration. It is envisaged that the PEP can be finally adopted by the end of the year and can be applied from 1 Jan 2020 onwards.

Finally, on behalf of the Group, I would like to express our deep appreciation to the outgoing Steering Committee Chair, Mr Hui Zhang (CCS) and Technical Committee Chair, Ms Antje Herms-Bondzio (LR), for their excellent work and commitment over the past months.

Best regards,

Jacek Poturski

Steering Committee Chair for 2019

Changes to the EU RO MR Group Leadership 2019 – Steering Committee



Hui Zhang (CCS)



Jacek Poturalski (PRS)

From 1 January 2019, Jacek Poturalski of PRS took over the Steering Committee Chair from outgoing Chair, Hui Zhang of CCS.

Jacek Poturalski will chair the Steering Committee for 2019.

For more information see www.euomr.org/about-us

Changes to the EU RO MR Group Leadership 2019 – Technical Committee



Antje Herms-Bondzio (LR)



Benqi Ge (CCS)

From 1 July 2019, Benqi Ge of CCS will take over the Technical Committee Chair from outgoing Chair, Antje Herms-Bondzio of LR.

Benqi Ge will chair the Technical Committee for one year until 30 June 2020.

For more information see www.euomr.org/about-us

EU RO Mutual Recognition Group – Workshop Held in Hamburg on 5 September 2018

During the SMM in Hamburg, the EU ROs were happy to invite their most important stakeholders to a workshop on the topic of ‘Mutual Recognition’ (MR).

The aim of the workshop was to inform stakeholders and interested parties about the progress of implementation and recent developments of the EU RO MR scheme and to provide an opportunity for sharing experience relating to the application of MR in the context of ship classification.

After a welcome address by the Managing Director of the German Shipbuilding and Ocean Industries Association (VSM) and a report by the EU ROs, presentations were given by representatives of associations of the manufacturing industry (the Secretary General of SEA Europe and the Managing Director, VDMA Engines and Systems), insurers (the Secretary General of the International Union of Marine Insurance, IUMI) as well as ship-owners and operators (the Marine Director of the International Chamber of Shipping (ICS) and the Senior Technical Manager at INTERTANKO).

The presentations were followed by a panel discussion, where panellists representing the Liberian Register, ICS and VDMA Engines and Systems, discussed the impact of MR on safety, innovation in the changing industry landscape and on the sovereignty of non-EU flag states as well as questions from the audience.

While MR might be a time-saving and cost-effective product approval solution for some manufacturers, it became evident that there are clear limitations in the implementation due to concerns related to aspects of safety, freedom of choice for shipowners to engage with their trusted classification society, global acceptance of the scheme due to sovereignty of flag states in exercising their obligations under UNCLOS and the expectation by insurers that the survey of safety critical

materials, equipment and components shall be carried out by the insurer approved RO classing the vessel.

'Allowing MR on safety critical materials, equipment and components would undermine the significance of ship classification as a key component of today's safety regime at sea' said the Secretary General of IUMI.

Overall, it was concluded by organisers and participants, that the Workshop provided an excellent opportunity to increase knowledge and awareness regarding the implementation of the MR scheme and to develop a common understanding of the different interests and positions.

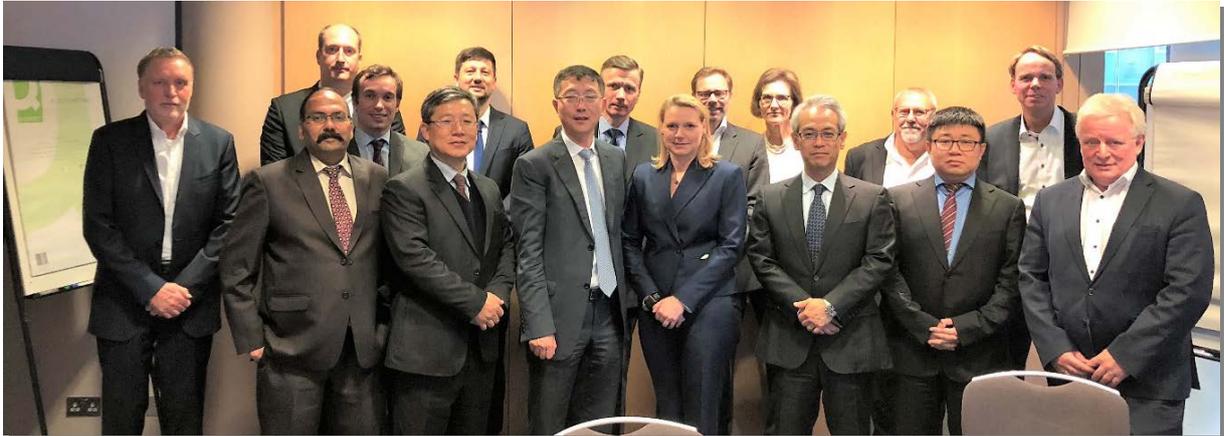
Due to the positive feedback following the workshop, a resumption is planned to take place during next SMM in 2020.

Impressions from the Workshop



Steering Committee Meetings Held in London (Nov 2018) and Gdańsk (Mar 2019)

Steering Committee meetings were held November 2019 in London (chaired by CCS, outgoing Chair) and March 2019 in Gdańsk (chaired by PRS, new Chair for 2019). Major topics of the meetings included preparation of the Industry Technical Review Meeting and the Product Evaluation Process (PEP) model Industry Consultation Phase as well as the extended dialogue with stakeholders and future projects of the Group.



London Nov 2018, from left to right: Ulrich Foerster(LR), Praveen K. Mishra (IRS), Kruno Feric (CRS), Paul Delouche (BV), Jong-yuel Choi (KR), Alexey Zakharov (RS), Hui Zhang (CCS, outgoing SC Chair), Jacek Poturalski (PRS, incoming SC Chair), Antje Herms-Bondzio (LR, TC Chair), Christopher Perrocco (ABS), Irene Wieja (DNV GL, Secretary of the MR Group), Masaki Matsunaga (NK), Claudio Abbate (RINA), Benqi Ge (CCS), Manfred Schlott (DNV GL), Hans Gaetjens (BV)

29th & 30th Technical Committee Meeting Held in Hamburg (Nov 2018 & Mar 2019)

The Technical Committee, chaired by LR, convened in Hamburg in Nov 2018 and March 2019 for its regular meetings to finalize the Mutual Recognition Tier 7 Technical Requirements, prepare the Industry Technical Review Meeting held 29 November in Hamburg and discuss the development of the next tier of Technical Requirements as well as the new TR Maintenance Cycle (under consideration).



Hamburg Mar 2019, from left to right: Koichi Nishifuji (NK), Andrea Paravagna (RINA), Guillaume Druart (BV Proxy), Haitao Wang (CCS), Wojciech Kozyro (PRS), Antje Herms-Bondzio (LR, TC Chair), Lucio Trevisan (ABS), Jung-keun Byun (KR Proxy), Sergei Vinnichenko (RS), Zeljan Skaro (CRS), Praveen K. Mishra (IRS Proxy), Lars Laanke (DNV GL)

EU RO MR Group Website

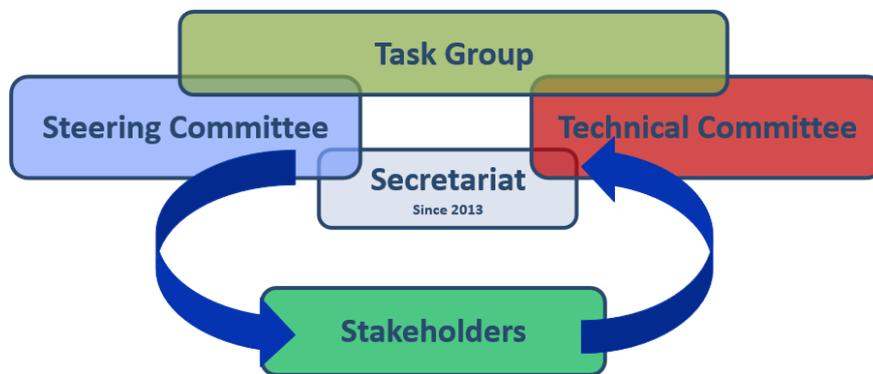
As announced in Newsletter Issue No. 8, the EU RO MR Group launched its [new website](#) in March 2018 after the finalization of an industry consultation phase. So far, all experience gained, and feedback received after the website went live was positive.

In this context we would like to remind all interested parties that the distribution of our Newsletter as well as of all other news via email has been suspended and was replaced by the new subscription service.

To continue receiving news and newsletters from the EU RO MR Group, you may subscribe on the website here: [Subscription](#)

4th Industry Technical Review Meeting (TRM) Held in Hamburg on 29 November 2018

TRM Meetings are an integrated part of the MR Group activities with solely focusing on technical and related procedural TR Development processes.



The MR TRM was organised by the EU ROs to present the current status of the MR TR development process and to enable the collection and initial discussion including review of feedbacks on MR technical issues regarding new and existing MR TRs and the MR certification process. It was also an opportunity to provide information on the existing MR TRs and related Change Requests and/or Requests for Clarification.

Further, the future model to evaluate products for the MR scheme was introduced and explained with the help of an example product as suggested by one of the participating industry representatives.

The MR TRM was attended by representatives of European based Marine Equipment Industry Associations and manufacturers along with members of the EU RO MR Technical Committee. It encouraged a two-way exchange of technical information on the development and maintenance of MR TRs. The status of development of the revised methodology for safety criticality assessment, being under review since 2017, was presented.

The report of the TRM 2018 can be found on the EU RO MR Website – [Stakeholder relations](#).

Product Development

Tier 7 Technical Requirements Entering into Force 01 July 2019

On 01 January 2019, the EU RO Mutual Recognition (MR) Group published MR Technical Requirements for an additional 8 type approval products under the MR scheme. The new TRs will enter into force on 01 July 2019.

The EU ROs developed these MR technical requirements by comparing requirements for type approval across the 12 class societies, selecting products suitable for MR, taking into account the priorities indicated by stakeholders, and collectively agreeing on the most demanding and rigorous standards for the selected products as required by Article 10.1 of Regulation (EC) 391/2009.

The new Tier 7 Technical Requirements cover the following products:

- **Differential Pressure Switches**
Differential pressure switches are used in applications to signal that a predetermined pressure difference has been reached as a result of widening or narrowing difference between the two points within piping systems or machinery.
- **Dual Temperature and Pressure Switches**
Dual Temperature and Pressure Switches (hereinafter switches) have both temperature and pressure measurement capabilities with relevant output change-over and combined within the same device.
- **Flow Switches**
Fluid flow switches are generally made of a casing containing the switch and a probe or other similar device projecting from the same and immersed in, or in other ways sensing the presence of, the fluid flow (set-in type).
- **Level Switches**
Level switches are devices composed of an electrical switch operated by a sensor able to detect the presence of a liquid at given levels.
- **Position Switches**
Position switches and proximity switches suitable for marine use.
The output of a position/proximity switch is determined by the presence or absence of a designated object. This digital output could be represented by a switched-, voltage-, current-, resistance- or frequency signal.
- **Pressure Relief Valve in Class III Piping System**
Pressure relief valve in class III piping system as defined by IACS UR P2.2 Rev.4 intended to the valves in class III pipelines systems which automatically, without the assistance of any energy other than that of the fluid concerned, discharges a quantity of the fluid so as to prevent a settled safe pressure being exceeded, and which is designed to re-close and prevent further flow of fluid after normal pressure conditions of service have been restored.
- **Pressure Switches**
A pressure switch is simply a device capable of detecting a pressure change and, at a predetermined pressure, opening or closing an electrical switch. There are two basic types of pressure switches: electromechanical and electronic/solid state.
- **Temperature Switches**
Temperature Switches has temperature measurement capabilities with relevant output change-over. Switches may have electric and/or electronic parts and be externally power supplied.

Controlled versions of the agreed MR Technical Requirements can be found here:

<http://www.euromr.org/technical-requirements>.

Maintenance of TRs

Further to the development of new Technical Requirements, efforts by the MR Group are invested in the maintenance of the existing TRs. Triggered by either industry or by the EU ROs themselves, all existing TRs are being updated to enhance their applicability, both from an editorial and a technical perspective, whenever need is seen. In a special effort, the Technical Committee is currently looking into harmonizing the referencing of standards as far as possible.

To support with explanations and clarifications, Technical Interpretations are developed to improve the use of the TRs, if requested and found appropriate.

A new TR Maintenance Cycle is under consideration: to review the existing scope regarding

- Testing requirements
- Referenced standards
- Updates of standards
- References to other TRs
- Editorial alignment
- Limitations and their origin

It is planned to start with 12 TRs from similar product groups and finalize 12 TRs per year.

Product Evaluation Process (PEP)

The existing methodology for safety criticality assessment is under review since 2017.

It represents an improvement of the current Simplified Risk Based Model (SRBM), enabling better justification of the safety criticality of a product suggested for MR, moving away from Opt-In, Opt-Out generic questions to more technically focused criteria based on Class Rules and regulatory requirements, as applicable.

The assessment process consists of 3 levels of evaluation:

1. Basic Evaluation → focusing on applicable Standards & Regulations
2. Product Evaluation → focusing on type of product and Rule Requirements for Design Assessment / Survey
3. System Evaluation → focusing on integration and application case of product in Ship 's System

It can be applied by any EU RO in conjunction with their Rules and is a transparent evaluation process, publicly available and usable by industry and manufacturers to test eligibility of their products.

Guiding questions / instructions have been developed to assist with the implementation and future application of the process.

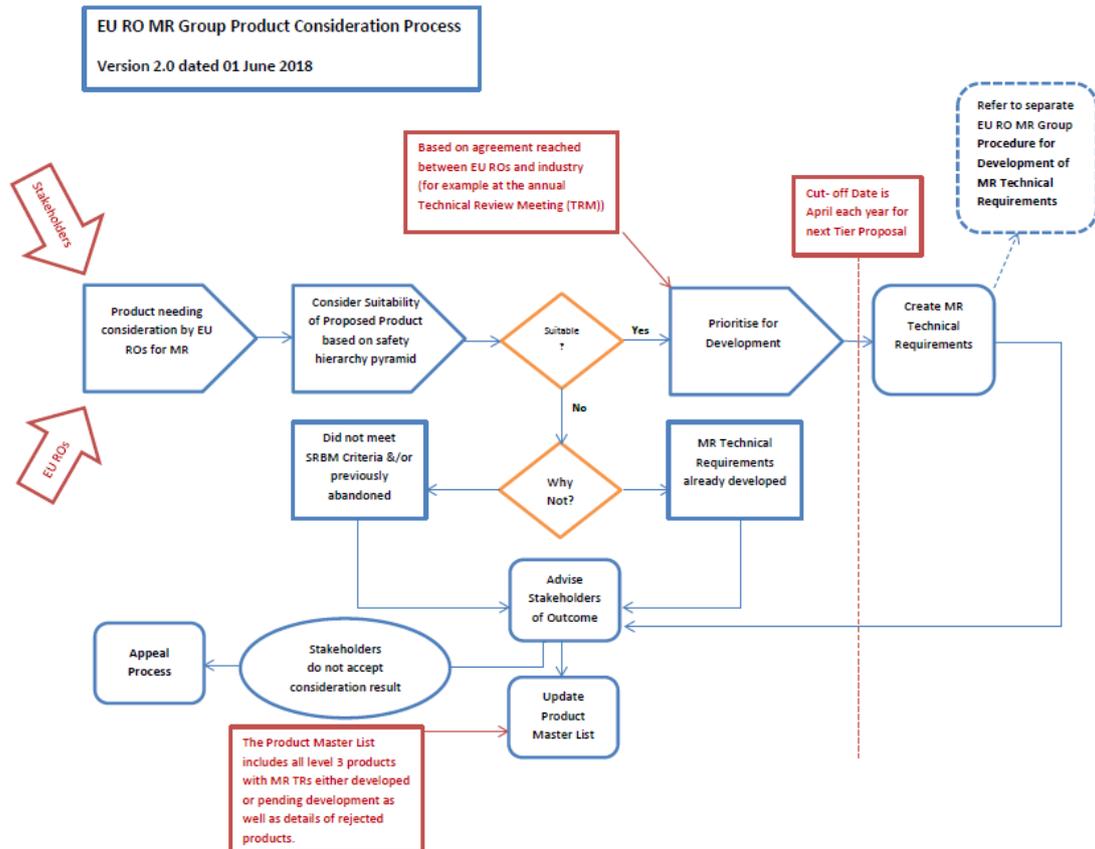
Following the first introduction at the Technical Review Meeting (TRM) 2018, Associations and their members, representing the global marine equipment and technology industry, are now invited to review the draft Product Evaluation Process (PEP) in an Industry Consultation Phase lasting until 31 August 2019.

All feedback received until 31 August 2019 will be considered carefully and changes will be incorporated in the final version of the PEP, where appropriate.

The EU RO MR Group will provide a response on the outcome of these considerations, if feasible before the adoption of the PEP end of 2019.

For more details please see the EU RO MR Group website under [TR Development](#).

Product Consideration Process (PCP)



The process steps of the Product Consideration Process (PCP) have been amended to introduce the Appeal Process:

- In case of rejection of a product under consideration, the stakeholder may appeal the decision in writing by stating the reasons thereof and by justifying the appeal submitting relevant documentation within 3 months after having been notified of the rejection.
- The MR Group is obliged to re-consider the product under the Product Consideration Process on the basis of documentation submitted in the Appeal Case within a reasonable timeframe (normally not expected to exceed 6 months).
- The stakeholder will be advised of the result of his appeal.

Minimum content of MR TAC certificate

The [Appendix I to the Framework Document](#) was revisited and updated to reflect that the exact reference to the legislation and mentioning of "EU RO MUTUAL RECOGNITION" be included:

Rules & Standards

Technical requirement reference

Other standards as applicable (with identification of the version used for the conformity assessment)

Generic Sentence

"This is to certify to the Manufacturer named below, that the Product referred to herein has been inspected for the Manufacturer, pursuant to the relevant requirements of the European Union Recognised Organisation Mutual Recognition procedure, required by Article 10.1 of EU Regulation 391/2009, and has been found in accordance with those requirements."

Generic Statement

When a product is presented with this EU RO MR Type Approval Certificate for given application, its acceptability with regards to the limitations stated in the certificate conditions defined in 1b, 1c and 1d of the applied Technical Requirement will be evaluated by the EU RO in charge of classing the ship or being in charge of the unit/system certification.

In accordance with Article 10 of Regulation (EC) No 391/2009 of the European Parliament and of the Council of 23 April 2009 "on common rules and standards for ship inspection and survey organizations", the following organizations, recognized by the EU on this date, have agreed on the technical and procedural conditions under which they will mutually recognize this certificate:

- *American Bureau of Shipping (ABS);*
- *Bureau Veritas (BV);*
- *China Classification Society (CCS);*
- *Croatian Register of Shipping (CRS);*
- *DNV GL;*
- *Indian Register of Shipping (IRS)*
- *Korean Register (KR);*
- *Lloyd's Register Group Ltd. (LR);*
- *Nippon Kaiji Kyokai General Incorporated Foundation (ClassNK);*
- *Polish Register of Shipping (PRS);*
- *RINA Services S.p.A. (RINA);*
- *Russian Maritime Register of Shipping (RS).*

The scheme for the mutual recognition of class certificates for materials, equipment and components laid down by Article 10(1) of Regulation (EC) No 391/2009 is only enforceable within the Union in respect of ships flying the flag of a Member State. As far as foreign vessels are concerned, the acceptance of relevant certificates remains at the discretion of relevant non-EU flag States in the exercise of their exclusive jurisdiction, notably under the United Nations Convention on the Law of the Sea (UNCLOS). (In accordance with COMMISSION IMPLEMENTING REGULATION (EU) No 1355/2014 amending Regulation (EC) No 391/2009 - recital (25)).

Contact the EU RO MR Secretariat

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EU RO MR Group Events 2019

Date	Event
01 Jan 2019	Handover to new Steering Committee Chair (PRS)
05/06 Mar 2019	Technical Committee Meeting in Hamburg
12/13 Mar 2019	Steering Committee Meeting in Gdańsk
01 Jul 2019	Handover to new Technical Committee Chair (CCS)
01 Jul 2019	Entry into force of Tier 7 Technical Requirements (MR TRs)
15 May - 31 Aug 2019	Product Evaluation Process (PEP) Industry Consultation Phase
13/14 Nov 2019	SC Meeting
Nov 2019	TC Meeting
Nov 2019	TRM Meeting

Contact the EU ROs

- ABS - www.eagle.org
- BV - www.veristar.com
- CCS - www.ccs.org.cn
- CRS - www.crs.hr
- DNV GL - www.dnvgl.com
- IRS - www.irclass.org
- KR - www.krs.co.kr
- LR - www.lr.org
- NK - www.classnk.or.jp
- PRS - www.prs.pl
- RINA - www.rina.org
- RS - www.rs-class.org



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