



EU Standardisation Strategy

EBI position paper

European Boating Industry (EBI) welcomes the initiative to develop a new EU standardisation strategy and supports the objectives identified in the Commission Roadmap¹. The European recreational boating industry, represented by EBI, is a key stakeholder and beneficiary of a successful European standardisation process in relation to several key pieces of legislation (such as the Recreational Craft Directive 2013/53/EU, Personal Protective Equipment Regulation 2016/425).

Most standards used in the industry are covered by the Vienna Agreement and the sector takes part in standardisation work at ISO and CEN level since the 1990s, as well as working with harmonised standards related to consumer safety daily. International standardisation is key to support the globally exporting recreational boating industry and decreases international divergence. EBI hereby provides feedback on the key questions highlighted in the European Commission roadmap.

1) whether the current European standardisation system is fit for purpose to support European strategic interests

- European standards support European leadership in boat-building: European recreational boat-building is a key sector for the European economy, with manufacturing of recreational boats and components predominantly still taking place in Europe. SMEs are particularly strong in the sector, making up over 95% of companies. Technical standards implementing the essential requirements of Recreational Craft Directive 2013/53/EU help the sector to retain international competitiveness and protects its export capacity within the Single Market and internationally. This needs to be safeguarded in the future European Standardisation Strategy.
- Consider the position of innovative products in the standardisation process: There is a lack of standardisation activities in the field of innovative products (hybrid, hydrogen, and marinized electric propulsion technology). For these innovative technologies, a dedicated approach to standard-setting is required to speed up the process of bringing technology to market while leaving room for innovation to take place. The goal should be to stimulate the uptake of products where dissemination is in the public interest, especially the European Green Deal. This should focus on safety aspects and equipment interoperability.

2) how the EU can leverage and promote global leadership in standards-setting

- Increase European representation at ISO level: There is a lack of European representation in ISO activities, leading to a potentially unbalanced analysis of standards' impact for the European market and industry. This may lead to some standards being not entirely suitable to

¹ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13099-Standardisation-strategy_en



European requirements despite finally being published as harmonised standard. More effort is necessary by the European Commission and national standardisation bodies to increase European representation at ISO level, especially from manufacturers themselves. A more open approach to the rules of participation of European industry representatives should be sought at CEN and ISO level, encouraging, and facilitating companies to participate. The benefits of participation should be clearly communicated. Increasing European representation should also be supported by reducing the registration costs for Working Group members by national standardisation bodies, considering also that their work is done on a voluntary and unpaid basis (maximum 100€). Increased use of remote meetings will also facilitate the participation of technical experts, including from SMEs.

- Increased role of CEN and European members: Dedicated rules on non-European involvement in EU harmonisation processes should be considered to ensure EU strategic interest. The harmonisation process needs to be focused on European added value, with only European countries voting on relevant decisions. CEN should take a stronger role in the process.

3) whether changes in governance and working methods are required to improve the performance of the European standardisation system.

- Speed up harmonisation process: There are currently considerable delays between the publishing of a standard at ISO level and the official announcement in the OJEU. The current HAS system leads to more than 80% of standards failing the harmonisation process at first stage and then risk being left aside. There is also a risk of demotivating technical experts due to the slow process. The key improvements necessary are a swift harmonisation process, consistent guidance to HAS consultants, early HAS consultant's feedback process during standard development, quick feedback, and re-confirmation process in case of negative HAS assessments, as well as clear deadlines for OJEU publication adapted to the fixed dates mentioned below. Sufficient resources should be put and kept in place to support the work of the HAS consultants without interruption.
- Improving EU legal expertise in ISO process: Consideration of legal issues that could negatively impact the final assessment should be integrated at an earlier stage of standard development to increase the likelihood of a positive assessment. Working Group members cannot be expected to fully understand and integrate all legal requirements. If requested by Working Groups, CEN or the European Commission should therefore provide legal experts to assist in considering those legal aspects that are required to fulfil the formal requirements. The process of standard development and their content should however continue to be only focused on technical and engineering considerations.
- Monitoring system for the standards assessment process: Transparency of standard development and assessment throughout the standardisation process would improve predictability for stakeholders. A monitoring system for the entire process – from start to OJEU publication – with regular updates to stakeholders would be helpful.

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- Fixed dates for publication of harmonised standards: Currently, there are no fixed dates for publication of harmonised standards which harms predictability for the standardisation organisations, as well as industry. Two fixed dates per year for publication of harmonised standards should be assigned. This would also allow alignment of publication times with UK designated standards, which is important for industry to ensure alignment. In addition, flexibility for industry to adapt to new standards should be considered through sufficiently long transition periods.
- Improved and harmonised accident investigations at EU level: Improving consumer safety through technical standards relies on understanding real-life use of recreational boats. This can be best done by considering official accident investigation reports. Regrettably, this currently presents a bottleneck in the standardisation process as investigations of accidents involving recreational boats do not always take place and are not harmonised at EU level. This makes their use in standard development almost impossible. The reason is that Directive 2009/18 on Maritime Accident Investigations does not apply to incidents involving pleasure yachts/craft not engaged in trade, unless crewed and carrying more than 12 passengers for commercial purposes or when involved in an incident with a ship covered by the Directive. EBI supports harmonising the approach and fully including pleasure craft in the scope of the Directive through its current review². In the US, accidents of recreational boats are well investigated and documented. This leads to a situation where European standards may be developed based on US accident investigations but not European ones. It is important to consider the difference between operational/user-based issues in accidents compared to those related to technical issues. The former makes up the vast majority of incidents. Common guidelines for investigations of incidents involving recreational craft should be developed.
- Regulatory cooperation activities with the UK: Given that EU and UK product-specific Directives and Regulations are currently identical (e.g. EU Recreational Craft Directive and UK Recreational Craft Regulations), European industry supports alignment of the standard process. Through exchanges between the regulatory authorities and standardisation bodies, deviations and different timescales between harmonised and designated standards should be avoided as much as possible. This should be included in the regulatory cooperation activities outlined in the EU-UK Trade and Cooperation Agreement and requested from UK authorities.

² https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12642-Maritime-Accident-Investigation_en



About EBI

European Boating Industry (EBI) represents the recreational boating industry in Europe, which encompasses the following subsectors:

- boatbuilders
- engine manufacturers
- equipment manufacturing
- refit and maintenance companies
- boat dealers and importers
- marinas and yacht harbours
- boat charter and rental companies
- water sports rental companies
- other related companies

European inland and coastal waters count at least 6 million boats, 36 million regular boaters and over 6,000 marinas. The European recreational boating industry is made up of 32,000 companies (predominantly SMEs) which directly employ over 280,000 people. The sector is a key contributor to tourism and to local economies in coastal and island regions, and Europe is an important exporter of recreational boating products. The entire industry accounts for close to €20 billion economic turnover.

EBI is made up of the national associations representing the recreational boating industry in Europe, in addition to several individual organisations which are sustaining members. More information can be found on the EBI website: europeanboatingindustry.eu

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