

Regulation (EC) 391/2009 Art. 10.1  
Mutual Recognition  
Technical Review Meeting  
Stockholm, Sweden, 28 November 2019





# Technical Review Meeting Report

## November 2019

## Executive Summary

A full day's Mutual Recognition Technical Review Meeting (MR TRM) was organized on 28 November 2019 by the EU RO MR Group at the China Classification Society, Stockholm Office.

The aim of the MR TRM was to:

- Present the current status of the MR TR development and maintenance process and collected feedback on technical issues;
- Give an update on the status of the Product Evaluation Process (PEP);
- Address the industry comments to the PEP industry consultation;
- Explain the individual class rules principles, on which the PEP methodology is based;
- Provide an opportunity for industry input on the development and maintenance process of Mutual Recognition Technical Requirements (MR TRs) as well as on product consideration.

The MR TRM was attended by representatives of the European Marine Equipment Industry and other relevant associations along with members of the EU RO MR Group Steering and Technical Committee to enable a two-way exchange of technical information on the development and maintenance of MR TRs.

Overall, the feeling expressed by those attending the MR TRM was, that there were useful and constructive exchange.

It was especially appreciated that DG MOVE – participating as observer – contributed constructively to the discussions.

Participants appreciated in particular the information provided by the EU RO MR Group regarding the Classification rules' fundamentals, such as structure, underlying statutory requirements (SOLAS), definition of Essential Services, explanations regarding application case, and underlying safety considerations.

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## General introduction

This MR TRM was organised by the EU ROs as face to face information exchange related to the wide variety of technical aspects of the entire MR process.

The EU RO MR Group sees in the TRM another instrument to enhance the industry consultation process. Objective of the meeting is to focus on implementation and procedural aspects of the TRM development process, hence, to identify and discuss areas for potential simplification and general improvement related to the MR transformation process in close collaboration with stakeholders and their associations.

The TRM provides detailed information on all technical aspects of existing MR TRs on which the industry requested clarification. This includes but was not limited to related implementation processes and supporting procedures like the Product Consideration Process, PEP, Change Requests and Requests for Clarification. The TRM is intended to collect feedback on MR technical issues regarding new and existing MR TRs. Further, and as a principle of the TRM, an essential part of such meetings is to identify products which might be eligible for MR TR development or where a strong desire does exist to consider those.

The TRM was attended by representatives of European based Marine Equipment Industry Associations and manufacturers along with members of the EU RO MR Group Steering and Technical Committee. It encouraged a two-way exchange of technical information on the development and maintenance of MR TRs. The list of representation can be found in Appendix A.

The meeting was chaired by the Technical Committee Chair of the EU RO Group Benqi GE (CCS) supported by Group Secretariat and members of the EU RO MR Group Technical Committee. Lead Adhoc Group Risk II, Christopher Perrocco (ABS) presented the status of the PEP development, clarification regarding industry comments to PEP and a case study to enhance the understanding of the revised methodology for safety criticality assessment being under review since 2017.

Further, incoming TC Chair Lucio Trevisan (ABS) provided explanations regarding individual classification rules principles on which the PEP methodology is based.

The meeting was moderated by Dr Ulrich Foerster (LR).

Details of the agenda of the MR TRM can be found in Appendix B.

The TRM objectives were to:

- Present the current status of the MR TR development and maintenance process and collect feedback on technical issues;
- Give an update on the status of the Product Evaluation Process (PEP);
- Address the industry comments to the PEP industry consultation;
- Explain the individual class rules principles, on which the PEP methodology is based;
- Provide an opportunity for industry input on the development and maintenance process of Mutual Recognition Technical Requirements (MR TRs) as well as on product consideration.

The Moderator stated that all comments and statements made during the meeting would be fed back to the Steering Committee by the Moderator.

This report provides an overview of presentations as delivered during the TRM and summarises the discussions and conclusions that were drawn from the MR TRM. It also lists the follow up activities.

## EU RO MR Group Presentation

This paragraph summarizes the content of the presentations given by the EU ROs (Appendix C).

### ***Presentation part 1: Update on TC activities and TRM follow-up actions 2018 (TC Chair)***

Overview of the agenda and topics in and out of scope for the MR TRM.

- TR Development
- TR Maintenance

Summary of the actions taken during TR development and the industry consultation phase of the MR TR development project with overview of feedbacks received so far.

Summary of TR maintenance process including industry feedback on technical issues relating to TRs that had been collected under use of the Group's maintenance process and procedures.

Report on status of actions from TRM 2018

### ***Presentation part 2: Product Evaluation Process (PEP), (Lead Adhoc Group Risk II)***

Status of the Product Evaluation Process (PEP) including outcome of the PEP industry consultation.

### ***Presentation part 3: Classification Rules Principles (Incoming TC Chair)***

Classification rules' fundamentals, such as structure, underlying statutory requirements (SOLAS), definition of Essential Services, explanations regarding application case, and safety considerations.

## Industry Presentations

This paragraph summarizes the presentations given by Industry representatives (Appendix D).

### **Presentation 1: SEA E Class Group 'PEP: SEA Europe's Views'**

Klaus Rostell, Chair of SEA Europe's SEA CLASS Working Group

### **Presentation 2: SIEMENS AG 'EU RO Technical Review Meeting PEP – Siemens, SI CP View'**

Michael Schroeck, Certification, Smart Industry Division, Control Products, SI CP R&D VC 2

## Overview of TRM Discussions

### **Introductions and welcome addresses (SC Chair and Moderator)**

SC Chair, Jacek Poturalski (PRS) welcomed the participants to the 5th TRM and set the scene by appreciating participation and the opportunity for a face to face information exchange related to the wide variety of technical aspects of the entire MR process. The EU RO MR Group sees in the TRM another instrument to enhance the industry consultation process.

In 2019, the EU RO MR Group focussed on the finalization of the MR-PEP model and to the respective industry feedback. The MR-PEP model industry consultation did highlight that there is a demand to provide more clarity about the model itself. Furthermore, it became obvious that in this context the knowledge transfer about the class rules' architecture and rules development in compliance with regulatory obligations is of paramount importance to reach a common platform of understanding.

It was recognised that several questions obtained by stakeholders are focusing on generic and strategy-oriented questions where this forum might not be in the position to provide an answer to.

Any such question will be replied to by correspondence.

A status and outlook will be given regarding the EU RO MR Group's activities, including a process of re-testing of all those products which have been initially assessed utilizing the Simplified Risk Based Model (SRBM) taken all products in turn not considered as being eligible applying the principles of the former MR process. With this in focus, the intended maintenance process for the existing TRs can only start mid-2020.

In an introductory round for all participants (Tour de table), the participants introduced themselves providing statements regarding the process and their expectations as follows:

- MAN ES acknowledged the role of class as an important safety factor in shipping. MAN ES relies on Class and encourages to make processes leaner.
- DG MOVE stated that they have clear ideas how the scheme should be implemented and appreciates the constructive meetings with ROs. DG MOVE reiterated their respective expectations.
- Klaus Rostell, Chairman of SEA E Class Group, stressed that MR issues are of high priority for the SEA E Class Group and that it is in the interest of the EU industry.
- Benoit Loicq (SEA E) wishes to translate expectations by SEA E into a way forward.
- DANFOSS expectation is to change the need for multiple certification.
- Michael Schroeck representing the SIEMENS AG Electric Control Business Unit, wishes to achieve simplification of the certification processes by clustering products with same technical features into large product groups.

### **Update on TC activities (2.) and status of TRM Follow-up actions (3.)**

TC Chair lead through the technical work of the MR Group, outlining the developments since the last TRM and improvements of procedures and resulting documents to ensure consistency in the implementation and maintenance of TR's, (Request for Clarification [RfC], Change request [CRF], and

Product Consideration Process [PCP]) and the status of the actions from 2018 TRM. Please refer to the respective slides in the presentation.

Additional comments have been noted as follows:

On a respective question regarding the Technical Requirements Development it was confirmed, that no Product Consideration Form (PCF) has been received from Industry since November 2018. However, one product has been suggested to be developed in a different context.

The EU RO Group is currently re-testing 117 products under the PEP that were previously excluded applying the SRBM. Those products had been suggested by industry and EU ROs in the past years. Products previously suggested by industry (St Petersburg, 2015) are included in this re-testing.

The aim of the retesting is to apply the PEP to the previously rejected products, to identify potential products to be developed as outcome of the re-testing with PEP, or to re-confirm the previous assessment. A staggered approach will be taken by the MR Group in order to cope with the additional workload. It is anticipated that the review will be completed in June 2020, followed by an analysis of the outcome by the MR Group. Industry will be informed about the result of the analysis of the re-testing once available.

**Action: Inform industry about the result of the analysis of the re-testing once available.**

MAN ES asked whether there are any plans to include material into the scheme as stipulated in Art 10(1). MR Group replied that material is not considered under the MR process.

SIEMENS reiterated their proposal to combine similar products into one TR and suggested that the reduction of different MR TRs to one document would avoid effort and confusion and proposed to establish one MR TR for all low-voltage devices in accordance with the already existing class rules of the individual class societies.

In this context DG MOVE reiterated their request by to combine products to target those products that have dependencies and relationships into one TR.

**Action: Reconsider the proposal of grouping TR, taking into consideration the proposal by SIEMENS (TRM 2018). (To be addressed in the next maintenance cycle).**

The work on harmonization of EMC testing requirements, based on a respective request by industry (SIEMENS) has been taken up by the MR Group in close cooperation with SIEMENS. The work is ongoing and will be reflected in TRs in the next maintenance cycle.

**Action: Feedback outcome of the work on harmonization of EMC testing requirements to the industry after completion of the respective maintenance work.**

Regarding the revised minimum contents on the MR TAC it was appreciated that from 1 January 2020 the name of all EU ROs will appear on respective certificates (see Appendix 1 of the Framework Document V10.00)

## **Recap PEP Industry Consultation (4.)**

Christopher Perrocco (ABS), Lead AdHoc Group Risk II presented the outcome of the PEP industry consultation phase, responding to each comment made by one of the two commenters, IEC and/or SEA E. The detailed responses can be found in the respective presentation slides.

In the discussion, DG MOVE stated that IACS UI SC 134 is a very complex document with a lot in it, drafted by classification societies. It is understood that IACS members refer to the products therein. There would be a problem if the MR Group would exclude products because they are included in the IACS UI SC 134. The topic was referred to the presentation about the class rules principles.

Clarification was sought why PEP questions 5 and 6 are not combined and simply referred to as Unit Certification. It was explained that engineering and survey requirements may differ, depending on the rule requirement for the product. This will be illustrated in case studies as part of the presentations.

It is the opinion of DG MOVE that the MR Group should not ask questions related to the application case and unit certification as this should be the task and responsibility of the RO classing the ship after the product has been certified under MR. At that moment in time the RO classing the ship has still the right to reject the product under unit certification based on the application case. Thus, questions 7 and 8 can be asked on the basis of the use on board, but not on the level of certification of the product. Those questions are seen as a barrier to consider more products under the MR scheme.

The MR Group explained that according to class rules the starting point of unit certification is at the manufacturers' location for equipment and components subject to unit certification.

The intention of question 7 and 8 is to provide conditions under which simple products might enter the MR scheme in spite of being intended to be installed in essential services. Reference was made to further explanations given in the presentation on classification rules principles.

### **Action: Further explain the classification process (rules principles / rules architecture and classification process)**

MAN ES stated that putting requirements of SOLAS down to the individual component level is seen as critical and not productive. Service limitations only apply to the system, like redundancy, but are not related to the component the system is made of.

The MR Group replied that certification requirements for equipment and component are laid down in the respective requirements in the class rules as applicable for the product.

MAN ES asked whether emission control is seen as essential service. The MR Group responded that emission control, i.e. NOx compliance is a statutory requirement and is consequently not considered under MR.

Comments received in the industry consultation of the PEP and in further bilateral meetings illustrated the need to explain the PEP in the context of the class rules, as well as the structure and application of the classification rules.

### **Action: Better explain the methodology of the PEP and update instruction manual, soliciting help from the industry (Danfoss)**

## **Product Evaluation Process (PEP) (6.)**

Christopher Perrocco (ABS), Lead AdHoc Group Risk II, introduced the status of the Product Evaluation Process (PEP) after the industry consultation phase. At the example of case studies PEP was further explained.

## **Classification rules principles (5.)**

Incoming TC Chair (ABS) presented the Classification rules' fundamentals, such as structure, underlying statutory requirements (SOLAS), definition of Essential Services, explanations regarding application case, and safety considerations as can be seen in the respective presentation slides.

The presentation has been highly appreciated. All participants confirmed the value of the presentation as shown, as it did contribute to provide clarification to several questions.

It was acknowledged that there is a different perspective of classification societies who focus on the ship whereas manufacturers focus on the component they produce. The MR Group emphasised that the classification approach takes the ship as a starting point and the rules are structured top-down, breaking down the ship into systems and then in turn into their components, and using this approach in determining the safety criticality of each product within the system and finally the ship. On the other hand, the manufacturer is focused on the component / product, and approaches the ship-board integration from bottom-up, often considering the application case and the safety criticality with a system only at the later stage during installation.

DG MOVE stated that under the Simplified Risk Based Model (SRBM) it is understood that any product under Unit Certification considerations cannot enter the MR scheme. Also, under the PEP there is no significant change, and this is not agreed by DG MOVE. DG MOVE does not accept that Unit Certification is excluded just based on the PEP at equipment level, justified by system level knowledge. All products should enter the MR scheme. Limiting the scope is not acceptable to DG MOVE.

DG MOVE acknowledged there is no agreement between DG MOVE and the EU RO MR Group in this respect.

## **Feedback by industry (industry presentations) (7.)**

SEA E Class Group Chair Klaus Rostell and SIEMENS AG represented by Michael Schroeck presented the view of the industry as agreed in the SEA E Class Group on SEA E views on the PEP and more general on the concept of Mutual Recognition.

A discussion ensued on the role of ILAC and it was clarified by the EU RO MR Group that their role is not relevant in the context of MR.

**Action: The considerations in the industry presentations will be addressed by the EU RO MR Group**

## Conclusions and Recommendations

The MR TRM 2019 focused on issues related to

- the status of the product evaluation process (PEP Model)
- the need for clarification of class rules principles

and how to handle specific topics as raised by industry representatives.

The Group thanked all participants for their engagement, the valuable contributions and the fruitful discussions. It was concluded that the TRM fulfilled the aim to inform about the latest status and to share ideas and proposals to enhance the processes.

## Action List - Technical Review Meeting, 28 November 2019, Stockholm

### Actions for EU RO MR Group:

No.	Issues Raised	Timeline	Remark
1.	Inform industry about the result of the analysis of the re-testing once available.	Q3 2020	
2.	Reconsider the proposal of grouping TR, taking into consideration the proposal by SIEMENS (TRM 2018). (To be addressed in the next maintenance cycle).		
3.	Feedback outcome of the work on harmonization of EMC testing requirements to the industry after completion of the respective maintenance work.	Q3 2020	
4.	Further explain the classification process (clarification rules principles / rules architecture and classification process)		
5.	Better explain the methodology of the PEP and update instruction manual, soliciting help from the industry (Danfoss).		Meeting with Danfoss 7 Feb 2020 AdHoc Group Risk II
6.	Address considerations in the presentations.		

### Actions for Industry Associations:

No.	Issues Raised	Raised by
1.		

## Appendices

### Appendix A: List of TRM Participants

Participant	Surname	First Name
<b>EU RO MR Group</b>		
EU RO MR TC Chair/CCS	Ge	Benqi
EU RO MR Secretary	Wieja	Irene
ABS (Incoming TC Chair)	Trevisan	Lucio
ABS (AdHoc Group Risk II Lead)	Perrocco	Christopher
BV	Bellon	Didier
CRS	Škaro	Željani
DNV GL	Laanke	Lars
KR (Incoming SC Chair)	Park	Joo-sung
LR	Foerster	Ulrich
LR	Herms-Bondzio	Antje
PRS (SC Chair)	Jacek	Poturalski
RINA	Paravagna	Andrea
<b>Industry</b>		
SEA Europe	Loicq	Benoît
Danish Maritime	Rostell	Klaus
Federation of Norwegian Industries	Gorvell-Dahll	Lars
MAN Energy Solutions	Rasmussen	Christian
Siemens AG	Schroeck	Michael
Danfoss Drives A/S	Kristensen	Hans Peter
<b>Observer</b>		
DG MOVE	Seghers	Karl

## Appendix B: MR TRM Agenda

Meeting Type: 5th Industry Technical Review Meeting

Location: Stockholm, Sweden

Date: Thursday, 28 November 2019

Start Time: 09h30 (local Time) to 16h00

Time	Item	Presenters
09:30	1. Introductions and welcome address from: a. EU RO MR Group b. Relevant industry participants (tour de table)	Ulrich Foerster (LR), Moderator Jacek Poturalski (PRS), SC Chair Relevant industry participants
10:00	2. Update on TC activities	Benqi Ge (CCS), TC Chair
10:15	3. TRM Follow-up actions	Benqi Ge (CCS), TC Chair
10:30	4. Recap PEP Industry Consultation	Christopher Perrocco (ABS), Lead AdHoc Group Risk II
10:45	5. Classification rules principles	Lucio Trevisan, incoming TC Chair (ABS)
11:30	6. Product Evaluation Process (PEP) a. Status of development b. Clarification regarding industry comments to PEP c. Re-testing of products d. Case study	Christopher Perrocco (ABS), Lead AdHoc Group Risk II
12:30	Lunch	
14:00	7. Feedback by industry (industry presentations)	Relevant industry participants
15:30	8. Summary of discussion	Ulrich Foerster (LR), Moderator

**Appendix C: Presentations (EU RO MR Group and Industry)**