

SEA Europe Response to the Publication of:

Report from the Commission to the European Parliament and the Council pursuant to article 10.2 of Regulation EC 391/2009 on common rules and standards for ship inspections and survey organisations.

SEA Europe welcomes the European Commission (EC) report to the European Parliament and the Council as was required under Article 10 of Regulation EC 391/2009 in relation to the mutual recognition of classification certificates.

On the whole SEA Europe considers that this EC report is well balanced taking into account the efforts made by the European recognised organisations to propose an approach implementing the obligations included in Article 10. It also highlights the main concerns of the European maritime technology industry namely:

1. Increase of cost for certification
2. Additional administrative burden
3. Lack of international acceptance

SEA Europe strongly supports the recommendation that 'recognised organisations should consider simplifying the procedures for mutual recognition certificates in appropriate case so that their costs can be more competitive and **individual certificates can be phased out**. This would relieve individual companies of some of the administrative burden and lead to a wider international acceptance of the mutual recognition certificate.

SEA Europe also supports the call for the EU recognised organisations to **further develop the mutual recognition scheme**. However, the industry has expressed strong concerns that whilst positive steps have been taken there is still a perceived 'slowness' in bringing products, which are not necessarily deemed safety critical, under the mutual recognition scheme. Taking this into account the industry requests that the European Commission outline a timetable for a review of the process in three years' time to ensure a more rapid pace of implementation.

The European maritime technology, whilst not compromising safety, would like to support the development of a more advanced and comprehensive risk model for the selection of products belonging to the next (4th) safety criticality level. SEA Europe



would be willing to work closely with the EU ROs to identify eligible products for their proposed 6 month pilot study.

In conclusion, whilst there have been very important points made in the study the European industry is concerned that the lack of tangible recommendations and absence of a follow-up review means that efforts to move towards one set of class rules for many maritime products and a cost effective MR scheme will not accelerate. The maritime technology sector still views the traditional classification of products as an unnecessary cost / administrative burden and call on the **European Commission to commit to robust follow-up action e.g. by setting up a regular monitoring forum** to ensure that the process which has been embarked on will not stall or come to a halt.

Brussels, 22 September 2015