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NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 8-04

Subj: GUIDE TO MARINE EQUIPMENT APPROVALS COVERED BY US – EC MRA

1. PURPOSE. This Circular provides guidance on the "Agreement Between the United States of America (US) and the European Community (EC) on Mutual Recognition of Certificates of Conformity for Marine Equipment." This mutual recognition agreement (MRA) was signed on February 27, 2004 and will become effective on July 1st, 2004. The MRA's twin objectives are to facilitate US - EC trade in marine equipment and to promote bilateral cooperation on international marine equipment regulations. The MRA will allow a manufacturer to reach multiple markets on the basis of compliance with one set of regulatory requirements instead of multiple ones. This can directly lead to a reduction of costs for manufacturers in terms of testing and certification. The agreement is commonly referred to as the "US – EC MRA on marine equipment" and is simply referred to as the "MRA" in this Navigation and Vessel Inspection Circular (NVIC). This circular describes how the MRA will work and answers some anticipated questions regarding the process for obtaining approval using the MRA as well as how to determine compliance.

2. ACTION.

   a. Officers in Charge, Marine Inspection (OCMIs) and the Commanding Officer, Marine Safety Center are encouraged to bring this circular to the attention of the marine industry and other marine interests within their areas of responsibility. This circular will be distributed by electronic means only and is available on the World Wide Web at **http://www.uscg.mil/hq/g-m/nvic/index.htm**. Internet release authorized.

DISTRIBUTION SDL No. 140

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NON-STANDARD DISTRIBUTION: (SEE PAGE 3)

b. Coast Guard marine inspectors, classification societies acting on behalf of the Coast Guard, and other involved parties are encouraged to review the guidance contained in this Circular when determining if a material, item, or system is "USCG approved".

c. Manufacturers seeking, or currently having, USCG approval are encouraged to review the guidance contained in this Circular to determine if the MRA will permit their particular product to also be approved in accordance with the European Directive on Marine Equipment (Council Directive 96/98/EC as amended on Marine Equipment).

d. While the guidance contained in this document may assist the industry, public, and Coast Guard, the guidance is not a substitute for applicable legal requirements; nor is it a regulation itself. Thus, it is not intended nor does it impose legally binding requirements on any party outside the Coast Guard.

3. DIRECTIVES AFFECTED. None.

4. BACKGROUND. In December 1998, the United States Trade Representative (USTR) proposed to the European Commission the negotiation of an MRA on marine equipment under the Transatlantic Economic Partnership. Negotiations on an agreement began in late 1999. The Lifesaving & Fire Safety Standards Division (G-MSE-4) worked in close cooperation with USTR to develop the MRA's product scope based on a detailed product-by-product review of the US and EC marine equipment requirements. Many of the US and EC marine equipment requirements are based on standards and testing specified by the Safety of Life At Sea Convention (SOLAS). Of all the equipment items that were considered, only products having identical or equivalent requirements in each market were included in the scope of the agreement.

5. DISCUSSION.

a. The MRA does not change the requirements to use USCG approved equipment on US flag vessels. Officers in Charge, Marine Inspection and class society surveyors acting on behalf of the USCG should continue to require USCG approval where required by the applicable regulations.

b. The MRA allows reciprocal approvals to be given by both the US and the EC for certain marine products where it has been found that the approval process is identical or equivalent. Manufacturers will be able to obtain both USCG approval and European approval through only one review process. For example, a manufacturer having USCG approval for a hand flare distress signal is eligible to obtain the European approval (wheelmark) without further testing. In this case, the manufacturer would make application to the USCG. The USCG would authorize the use of the wheelmark based on the MRA and update the certificate of approval. Conversely, manufacturers currently having the wheelmark can obtain USCG approval on eligible products by making application to the appropriate European notified body. The notified body will authorize the use of a USCG approval number (slightly modified for distinction) and update their type approval certificate. Enclosure (1) provides a more detailed description of this process.

c. The MRA product scope includes 43 products in three categories: life saving equipment, fire protection and navigational equipment. Many approved marine products were not included because equivalence could not be determined. Therefore, products will not be accepted as "USCG approved" simply based on European approval markings (i.e., the wheelmark). It is envisaged that the product scope will be expanded in the future for items where after additional research the Parties agree that US and EC approval requirements are equivalent. Enclosure (2) is simply a copy of Annex II from the MRA, which specifies the product scope. Enclosure (3) takes these products and provides the USCG approval category for each in a quick reference table.

d. Manufacturers who obtain EC approval thru the USCG need to provide a declaration of conformity for the product in compliance with the EC Marine Equipment Directive. Enclosure (4) presents a sample manufacturer's "declaration of conformity."

e. Should a product ever be found to not comply with the applicable regulations, the MRA does have a provision for a two-way alert system, which will be used to pass information quickly on such products and initiate corrective action.

f. Officers in Charge, Marine Inspection, class society representatives, or manufacturers who have questions concerning the US – EC MRA or its implementation should contact G-MSE-4 staff at (202)-267-1444.

T. H. GILMOUR
Rear Admiral, U.S. Coast Guard
Assistant Commandant for Marine Safety,
Security and Environmental Protection

Encl: (1) Guide to US - EC Mutual Recognition Agreement
(2) List of products covered (Annex II of US - EC MRA)
(3) MRA Product Scope with USCG Approval Categories
(4) Example of Declaration of Conformity

Non-Standard Distribution:

D:l CG Liaison Officer MILSEALIFTCOMD (Code N-7CG), CG Liaison Officer RSPA (DHM-22), CG Liaison Officer MARAD (MAR-742), CG Liaison Officer JUSMAGPHIL, CG Liaison Officer ABS, Maritime Liaison Office Commander U.S. Naval Forces Central Command (1).
ABS Americas (1).
NOAA Fleet Inspection Office (1).
U.S. Merchant Marine Academy (1).

Guide to US - EC Mutual Recognition Agreement (MRA)

1.0 Introduction

Negotiations on an important mutual recognition agreement between the United States (US) and the European Community (EC) were concluded in June 2003 and the agreement was signed on February 27, 2004. The EC completed their internal ratification process in April 2004 and the required exchange of letters was finished in May 2004. The official implementation date for this MRA will be July 1st, 2004.

The agreement aims to simplify matters for manufacturers that wish to have both U.S. Coast Guard (USCG) type approval and the European certificates of conformity (see definition). The US-EC Mutual Recognition Agreement (MRA) on Marine Equipment is a result of a 5-year cooperative effort that recognizes the importance of facilitating US - EC trade in marine equipment and promoting bilateral cooperation on international marine equipment regulations. The MRA will allow a manufacturer to reach multiple markets on the basis of compliance with one set of regulatory requirements instead of multiple ones, as would be the case without the MRA. This can directly lead to a reduction of costs for manufacturers in terms of testing and certification.

1.1 MRA Terms & Definitions

Administration: means the Government of the State whose flag the ship is entitled to fly.

Certificate of Conformity: the document or documents issued by a Conformity Assessment Body of a Party certifying that a product fulfils the relevant legislative, regulatory and administrative requirements of that Party. In the U.S., this is the Certificate of Type Approval issued by the United States Coast Guard. In the EC, they are the certificates, approvals and declarations foreseen by Directive 96/98/EC.

Conformity Assessment Body: means a legal entity, whether a Regulatory Authority or a other body, public or private, that has the authority to issue Certificates of Conformity under a Party's domestic laws and regulations. Specifically:

1) The Notified Bodies designated by the EC Member States under Directive 96/98/EC;
2) The U.S. Coast Guard.

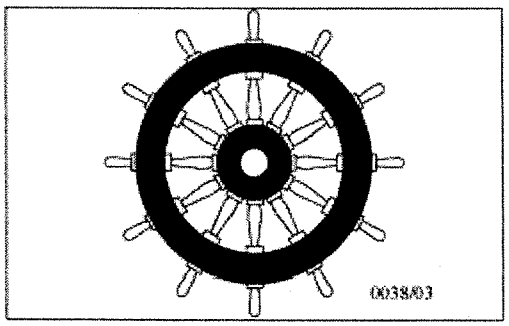
Declaration of Conformity: a descriptive document issued by the manufacturer under the MED system and provided to the customer.

Equivalence of technical regulations: means that the technical regulations of the Parties related to a specific product are sufficiently comparable to ensure that the objectives of each Parties' respective regulations are fulfilled. Equivalence of technical regulations does not mean that the respective technical regulations are identical.

Marine Equipment Directive: Council Directive 96/98/EC of 20 December 1996 on marine equipment, as amended. Commonly referred to as the **MED**.

MarED: the co-ordination group for the Notified Bodies assigned by the Member States to carry out the conformity evaluation procedures referred to in the Marine Equipment Directive.

Mark of Conformity: marking affixed to products as an indication of compliance with the Marine Equipment Directive (MED). Mark includes the four digit notified body number and two digits indicating the year that the mark was affixed to the product.



Notified body: a body authorized by the competent national administration of a Member State to carry out work in accordance with the MED.

Notified body number: is a unique four-digit identifier issued to each notified body. The number is included as part of the MED "Mark of Conformity." USCG NB number: 1408.

International Instrument: means the relevant international conventions, resolutions and circulars of the International Maritime Organization (IMO), and the relevant testing standards.(e.g., FTP Code, LSA Code).

Regulatory Authority: means a government agency or entity that has the authority to issue regulations regarding issues related to safety at sea and prevention of marine pollution, that exercises a legal right to control the use, installation, or sale of marine equipment within a Party's jurisdiction, and that may take enforcement action to ensure that products marketed within its jurisdiction comply with applicable legal requirements. The Parties' respective Regulatory Authorities are identified in Annex III of the MRA.

Technical regulations: comprise the mandatory product requirements, testing and performance standards and conformity evaluation procedures laid down in the legislative, regulatory and administrative provisions of the Parties related to marine equipment, as well as any applicable guidelines for their application.

The Parties: the United States of America and the European Community member states.

Wheelmark: term commonly used to describe marking affixed to products as an indication of compliance with the Marine Equipment Directive (MED). More properly called the 'Mark of Conformity'.

1.2 Benefits of MRA

The initial MRA product scope includes 43 products in three main categories: life saving equipment (e.g. visual distress signals, marine evacuation systems); fire protection equipment (e.g. fire doors, insulation); and navigational equipment (e.g., compasses, GPS equipment, echo-sounding equipment). The agreement also contemplates expanding the product scope in the future for items where it can be agreed that the requirements are equivalent. The complete listings of eligible products are contained Annex II of the MRA (see enclosure (2) of the NVIC). The following table is intended to help manufacturers understand the benefits of the MRA:

Scenario		Benefits of the MRA
Manufacturer currently holds the "wheelmark" for an item covered by the MRA (i.e., listed in Annex II of MRA) but does not have USCG approval.	→	If manufacturer wishes to have USCG approval, then application should be made to the notified body that issued the relevant MED certificates authorizing the "wheelmark."
Manufacturer currently has USCG approval for an item covered by the MRA (i.e., listed in Annex II of MRA) but does not have the "wheelmark."	→	If manufacturer wishes to have the "wheelmark," then application should be made to the USCG. USCG approval certificate will be reissued to show that the manufacturer is eligible to apply the "wheelmark" to the product as allowed under the MRA.
Manufacturer currently has both USCG approval and the "wheelmark." Manufacturer wishes to alleviate some of the burden of maintaining both the USCG required "follow-up program" and the MED "quality assurance" system. Item is covered by the MRA (i.e., listed in Annex II of MRA)	→	Manufacturer may decide to terminate one of the type approvals and then get it back based on the MRA. For example, the manufacturer could terminate the USCG approval and then get a new USCG approval from the notified body that issued the relevant MED certificates authorizing the "wheelmark."
Manufacturer currently has both USCG approval and the "wheelmark" for item covered by the MRA (i.e., listed in Annex II of MRA). Manufacturer wishes to maintain both approvals independently.	→	MRA does not apply. Manufacturer must continue to comply with all requirements of each separate type approval system. For example, the USCG required "follow-up" program and the MED "quality assurance" must both continue to be maintained.
Manufacturer has a product not covered by scope of MRA (i.e., not listed in Annex II of MRA). Manufacturer desires type approval.	→	MRA is not applicable. Manufacturer should seek type approval for the specific market for which they wish to sell (e.g., USCG, European, or both)

Manufacturer has USCG approval and does not wish to have the "wheelmark."	→	MRA does not apply. No action is needed. Simply continue to comply with USCG requirements for type approval.
Manufacturer has "wheelmark" and does not wish to have the USCG approval.	→	MRA does not apply. No action is needed. Continue to comply with requirements for maintaining the "wheelmark."
Manufacturer has neither approval. Manufacturer wishes to have both USCG type approval and the "wheelmark."	→	Recommend that manufacturer choose the type approval system that is most suitable. When making application for type approval, request both approvals as permitted by the MRA.

2.0 Markings

2.1 Product Numbering and Markings

The MRA does not contain specific provisions for the EC and the US to mutually accept each others approval marks. Instead, the MRA allows the EC and US to authorize the marking of each other's approved equipment that has been determined to be equivalent and is listed in enclosure 2 of this NVIC.

While it may have been possible to mutually recognize each other's markings based on the equivalent technical requirements, it was considered better to maintain the respective marking requirements to avoid confusion since not all equipment is covered by the MRA. This will also make it easier for regulators, vessel owners/operators, and those responsible for purchasing to ensure regulatory compliance. Therefore, all products intended for U.S. flag vessels must be marked with the appropriate USCG approval number. This means that products listed in Annex II of the MRA that have received USCG approval through the MRA will have both EC and USCG markings.

2.2 Equipment receiving USCG Approval from the EC

EC Notified Bodies acting under the authority of the US-EC MRA are permitted to issue USCG approval numbers for products covered by the MRA. This approval number will be similar to a standard USCG approval number but will include the Notified Body numbers of the groups involved in the EC product approval process.

Generally, one Notified Body conducts both design and production evaluations similar to the USCG approval process. For this case, the USCG approval number issued by that Notified Body would be in the form of:

USCG Approval Category/Notified Body Number/Unique Identifier.

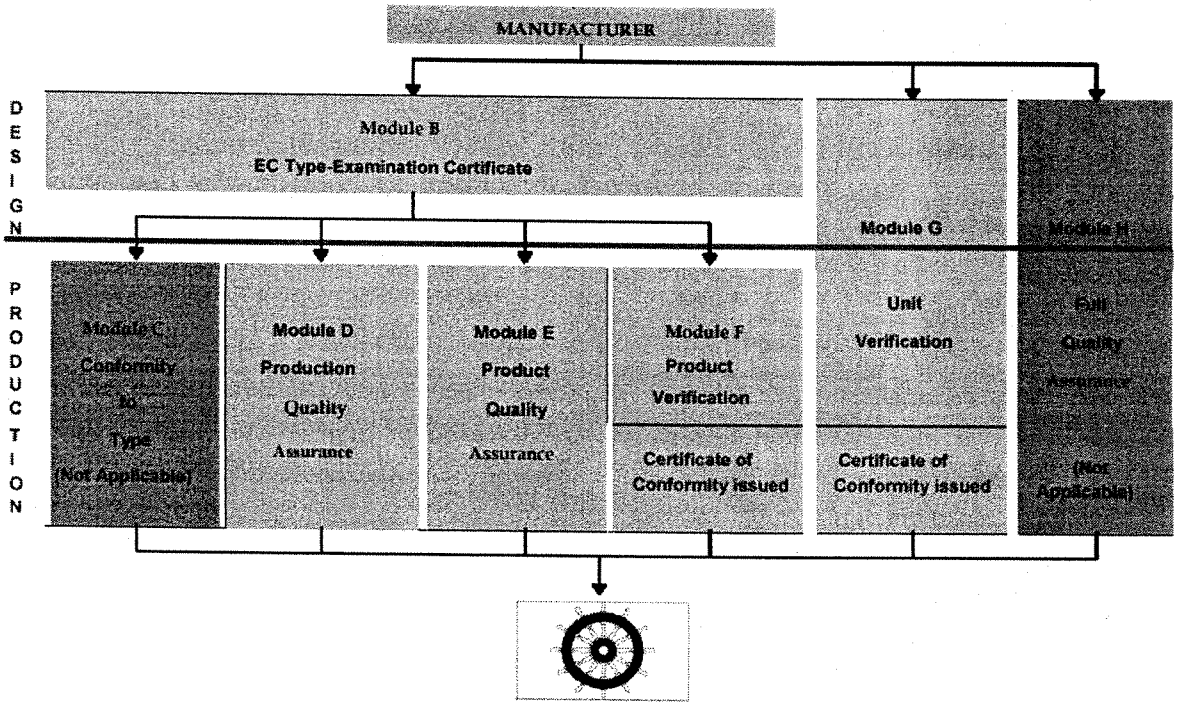
An example for a non-combustible material and a Notified Body with the number "0038" is: **164.109/EC0038/zzz** where "**zzz**" is the unique identifier for this product.

But under the EC approval process, it is possible for one Notified Body (NB#1) to conduct the design evaluation (Module B) of the approval and another body (NB#2) to conduct the production evaluation (Module D, E, or F). In this case, the USCG approval number can only be issued after both modules are completed and only by NB #2 on their Module D, E, or F certificate. The USCG approval number would be in the form of:

USCG Approval Category/NB#1 Number/Unique Identifier/NB#2 Number.

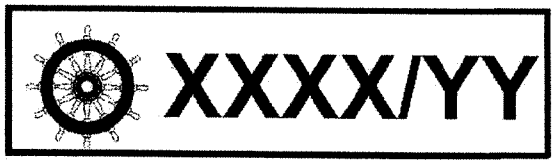
An example of this USCG approval number with Notified Body "0038" completing Module B and Notified Body "1121" completing Module D is: **164.109/EC0038/zzz/EC1121.**

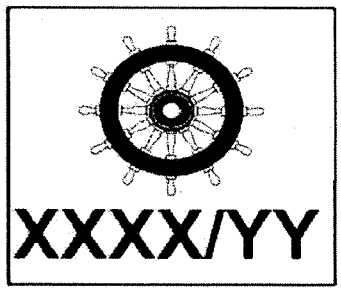
The following diagram provides a simplistic explanation of the EC approval process:



2.3 Equipment receiving EC Approval from the USCG

Manufacturers obtaining authorization to apply the wheelmark to their products from the USCG will need to ensure that the marking is in accordance with the MED. The following are examples of the required "wheelmark":





- The mark shall be followed by the USCG notified body identification number (XXXX = 1408) and by the last two digits of the year in which the approval is given (YY = 04).
- Minimum size of the wheel and numbers is 5 mm (may be waived for small devices)
- The mark shall be affixed to the equipment or to its data plate so as to be visible, legible and indelible throughout the anticipated useful life of the equipment. However, where it is not possible nor warranted on account of the nature of the piece of equipment, it shall be affixed to the packaging of the product, to a label or to a leaflet.

2.4 Certificates of Approval Endorsement

The USCG Certificate of Approval (COA) will be endorsed with a statement to indicate that a manufacturer may apply markings required for use on EC member state vessels.

For example:

> "The manufacturer is allowed to affix the Mark of Conformity as shown below in accordance with Article 11 of the MED 96/98/EC, as amended, on Marine Equipment and issue a Declaration of Conformity as allowed by the "Agreement between the European Community and the United States of America on Mutual Recognition of Certificates of Conformity for Marine Equipment" signed February 27, 2004.
>
> 1408/YY
>
> Item complies with requirements of Annex A.1, Item No. A.1/#.## of the directive."

Where A.1/#.## is the item number or EC approval category equivalent for each product covered by the MRA as listed in Enclosure (2) and (3) for reference.

A similar endorsement will also be required to be added to the EC certificate as shown below. The USCG approval number will only be assigned and this wording will only appear after both design and production modules have been completed and will appear on the production module certificate (Module D, E, or F) as discussed in section 2.2.

> "The manufacturer is allowed to affix the U.S. Coast Guard approval number [Approval Category/Notified Body Number/Unique Identifier] as allowed by the "Agreement between the European Community and the United States of America on Mutual Recognition of Certificates of Conformity for Marine Equipment" signed February 27th, 2004."

3.0 Finding approved products

3.1 Products Approved by the USCG

Under the MRA, the EC and US have agreed to make available to the public their lists of products for which they have issued Certificates of Conformity.

The Coast Guard will accomplish this via the "CGMIX" website at: http://cgmix.uscg.mil/Equipment/. A search option has been added to "CGMIX" to specifically locate products that have been issued a wheelmark approval under the MRA by the USCG. The "wheelmark" will appear in both a column on the search results page and on the copy of the certificate of approval for easy recognition of this equipment. This website is the modern replacement of the paper book "Equipment List, COMDTINST M16714.3 (series)". While the last edition (COMDT M16714.3E – 15 May 1994) is still considered a valid Coast Guard document, it no longer reflects the current status of approved equipment. The information contained in "CGMIX" is based on the information contained in the CG approved equipment section of the intra-CG website called Marine Information for Safety and Law Enforcement (MISLE) and is updated automatically every week. An advantage of "CGMIX" is the ability to get all information contained on a Coast Guard approval certificate whereas the paper "Equipment List" provided only a short description of the item. The approval certificate may contain important information regarding the installation or use of the item. USCG approvals issued by a European notified body will not be entered into CGMIX and therefore will not be found at the "CGMIX" website.

3.2 Products approved by European Notified Bodies

The EC will post the list of products they have approved under the MRA on their Marine Equipment Directive (MarEd) website. The MarED is the coordination group for all the Notified Bodies that carry out the conformity evaluation procedures referred to in the MED. The MarED website contains general approval information similar to "CGMIX" and has information about the MarED Group, Notified Bodies and the MED. The URL for the MarED website is www.mared.org. Access to the product database on the MarED website is available to the public. To access the MarED you will need to complete the registration form to receive a free membership.

The following are some examples of how the website might be used:

- Verification of product approval numbers, standard used for approval, manufacturer information or approving Notified Body information.
- Find listing of notified bodies and associated MED identification number.
- Search database of authorized equipment to be installed on EU flagged merchant vessels according to the European MED.
- Read the text of the MED and associated annexes.

If there are ay questions or concerns with products approved by the EC for the USCG, please contact the G-MSE-4 staff at 202-267-1444.

4.0 Manufacturer's Information

Manufacturers will play an important part in making the MRA work efficiently. Manufacturers are expected to be forthcoming with information related to the proper use and installation of their particular item, equipment, or system. The objective is to ensure that the product will reflect the conditions of the type approval, which is based on standards and testing. This will include providing copies of approval certificates, applicable drawings, installation instruction, etc. as needed by the designer, shipyard, vessel representative, classification society, and Coast Guard representative.

Manufacturers supplying to the European market must affix the "wheelmark" to approved equipment or materials as previously discussed. In addition, they will need to supply a "Declaration of Conformity." This declaration is a descriptive document issued by the manufacturer and supplied to the customer. There is no standard format for this declaration and manufacturers are at liberty to customize their Declarations. One example is provided as enclosure (4) to this NVIC. The Declaration of Conformity should at a minimum contain the following information:

- Manufacturers Name & Address
- Name of product and state its manufacturer's Type No. or Code
- MED's Annex A.1 Item Number (e.g., A.1/3.16 for fire doors)
- List all relevant standards with which it is declared to comply
- Notified Body authorizing the affixing of the Wheelmark
- Conformity route used
- Notified Body Certificate of Approval No.
- Product serial numbers and batch/lot identification (if applicable)
- Identification of signatory and their authority to sign the Declaration of Conformity

5.0 Summary

To summarize, the important points regarding the US-EC MRA are as follows:

- The MRA (Annex II) specifically identifies which items are covered.
- The MRA is effective July 1st, 2004.
- The USCG will not accept the MED "wheelmark" in lieu of USCG approval numbers on U.S. flag ships. Instead, the MRA provides a means to obtain USCG Approval for eligible products from EC notified bodies.
- A manufacturer having the MED "wheelmark" will make application for USCG type approval to the notified body that issued the MED certificates authorizing the "wheelmark."
- A manufacturer having a USCG type approval will make application for the MED "wheelmark" to the Coast Guard.

Annex II of the MRA - Product Coverage For Mutual Recognition

Life saving appliances

Product item identification	Applicable international instruments for construction, performance and testing requirements[1]	EC technical regulations, item number indicated in Annex A.1 of directive 96/98/EC, as amended	US technical regulations
Lifebuoy self-activating smoke signals (pyrotechnics) Note: Expiration date not to exceed 48 months after month of manufacture.	LSA Code, sections 1.2, and 2.1.3; Recommendation on Testing, Part 1, paragraphs 4.1 to 4.5, and 4.8, and Part 2, section 4; IMO MSC Circ.980, section 3.3.	A.1/1.3	Guidelines for Approval of "SOLAS" Pyrotechnic Devices, October 1998
Rocket parachute flares (pyrotechnics) Note: Expiration date not to exceed 48 months after month of manufacture.	LSA Code, sections 1.2, and 3.1; Recommendation on Testing, Part 1, paragraphs 4.1 to 4.6, and Part 2, section 4; IMO MSC Circ.980, section 3.1.	A.1/1.8	Guidelines for Approval of "SOLAS" Pyrotechnic Devices, October 1998
Hand flares (pyrotechnics) Note: Expiration date not to exceed 48 months after month of manufacture.	LSA Code, sections 1.2, and 3.2; Recommendation on Testing, Part 1, paragraphs 4.1 to 4.5, and 4.7, and Part 2, section 4; IMO MSC Circ.980, section 3.2.	A.1/1.9	Guidelines for Approval of "SOLAS" Pyrotechnic Devices, October 1998
Buoyant smoke signals (pyrotechnics) Note: Expiration date not to exceed 48 months after month of manufacture.	LSA Code, sections 1.2, and 3.3; Recommendation on Testing, Part 1, paragraphs 4.1 to 4.5, and 4.8; and Part 2, section 4; IMO MSC Circ.980, section 3.3.	A.1/1.10	Guidelines for Approval of "SOLAS" Pyrotechnic Devices, October 1998
Line-throwing appliances (pyrotechnics) Note: Expiration date not to exceed 48 months after month of manufacture.	LSA Code, sections 1.2, and 7.1; Recommendation on Testing, Part 1, section 9; and Part 2, section 4; IMO MSC Circ.980, section 7.1.	A.1/1.11	Guidelines for Approval of "SOLAS" Pyrotechnic Devices, October 1998
Rigid liferafts Note: The emergency pack is not covered by the Agreement	LSA Code, sections 1.2, 4.1 and 4.3; Recommendation on Testing, Part 1, paragraphs 5.1 to 5.16, and 5.20; IMO MSC Circ.811; IMO MSC Circ.980, section 4.2; IMO MSC Circ.1006 or other appropriate standard for hull or fire-retardant covering.	A.1/1.13	Rigid Liferaft – Coast Guard (G-MSE-4) Review Checklist, 27 July 1998

1 "LSA Code" refers to the International Life-Saving Appliance Code adopted on 4 June 1996 (IMO Resolution MSC.48(66)).
"Recommendation on Testing" refers to the IMO recommendation on Testing of Life-Saving Appliances adopted on 6 November 1991 (IMO Resolution A.689(17)) as amended on 11 December 1998 (IMO Resolution MSC.81(70).

Product item identification	**Applicable international instruments for construction, performance and testing requirements[1]**	**EC technical regulations, item number indicated in Annex A.1 of directive 96/98/EC, as amended**	**US technical regulations**
Automatically self-righting rigid liferafts Note: The emergency pack is not covered by the Agreement	LSA Code, sections 1.2, 4.1 and 4.3; Recommendation on Testing, Part 1, paragraphs 5.1 to 5.16, and 5.18 to 5.21; IMO MSC Circ.809; IMO MSC Circ.811; IMO MSC Circ.980, section 4.2; IMO MSC Circ.1006 or other appropriate standard for hull or fire-retardant covering.	A.1/1.14	Rigid Liferaft – Coast Guard (G-MSE-4) Review Checklist, 27 July 1998
Canopied reversible rigid liferafts Note: The emergency pack is not covered by the Agreement	LSA Code, sections 1.2, 4.1 and 4.3; Recommendation on Testing, Part 1, paragraphs 5.1 to 5.16, 5,18, and 5.21; IMO MSC Circ.809; IMO MSC Circ.811; IMO MSC Circ.980, section 4.2; IMO MSC Circ.1006 or other appropriate standard for hull or fire-retardant covering.	A.1/1.15	Rigid Liferaft – Coast Guard (G-MSE-4) Review Checklist, 27 July 1998
Float-free arrangements for liferafts (hydrostatic release units)	LSA Code, sections 1.2 and 4.1.6.3; Recommendation on Testing, Part 1, section 11; IMO MSC Circ.980, section 4.3.1;	A.1/1.16	46 CFR 160.062
Release mechanism for a. Lifeboats and rescue boats and b. Liferafts Launched by a fall or falls Limited to Davit-launched liferaft automatic release hook	LSA Code, sections 1.2 and 6.1.5; Recommendation on Testing, Part 1, section 8.2; and Part 2, paragraphs 6.2.1 through 6.2.4; IMO MSC Circ.980, section 6.1.3.	A.1/1.26	(Nothing in addition to international instruments)
Marine evacuation systems	LSA Code, sections 1.2 and 6.2; Recommendation on Testing, Part 1, section 12, IMO MSC Circ.980, section 6.2.	A.1/127	(Nothing in addition to international instruments)

Fire protection

Product item identification	**Applicable international instruments for construction, performance and testing requirements**[1]	**EC technical regulations, item number indicated in Annex A.1 of directive 96/98/EC, as amended**	**US technical regulations**
Primary Deck coverings	FTP Code Annex 1, Parts 2 & 6, Annex 2; IMO Resolution A.687(17); MSC/Circ. 916; MSC/Circ. 1004.	A.1/3.1	(Nothing in addition to international instruments)
"A" and "B" Class division fire integrity, including: Bulkheads (without windows) Decks Fire doors (with windows no larger than 645 cm^2) Ceilings and linings	SOLAS II-2/3.2; II-2/3.4; FTP Code Annex 1, Part 3, and Annex 2; IMO Resolution A.754 (18); MSC/Circ.916; MSC/Circ.1004; MSC/Circ.1005.	A.1/3.11	(Nothing in addition to international instruments)
Non-combustible materials	SOLAS II-2/3.33; FTP Code Annex 1, Part 1, and Annex 2.	A.1/3.13	(Nothing in addition to international instruments)
Fire doors Limited to fire doors without windows or with total window area no more than 645 cm^2 in each door leaf. Approval limited to maximum door size tested. Doors must be used with a fire tested frame design.	SOLAS II-2/9.4.1.1.2, II-2/9.4.1.2.1, and II-2/9.4.2; FTP Code Annex 1, Part 3; IMO Resolution A.754 (18); MSC/Circ. 916; MSC/Circ. 1004.	A.1/3.16	(Nothing in addition to international instruments)
Fire door control systems	SOLAS II-2/9.4.1.1.4; 1994 HSC Code 7.9.3.3; 2000 HSC Code 7.9.3.3; FTP Code Annex 1, Part 4.	A.1/3.17	(Nothing in addition to international instruments)

Product item identification	**Applicable international instruments for construction, performance and testing requirements**[1]	**EC technical regulations, item number indicated in Annex A.1 of directive 96/98/EC, as amended**	**US technical regulations**
Surface materials and floor coverings with low flame-spread characteristics Limited to exposed surfaces of ceilings, walls, and floors. Does not apply to pipes, pipe coverings, or cables.	SOLAS II-2/3.29; 1994 HSC Code 7.4.3.4.1 and 7.4.3.6; 2000 HSC Code 7.4.3.4.1 and 7.4.3.6; FTP Code, Annex 1, Parts 2 & 5, and Annex 2; IMO Resolution A.653 (16); ISO 1716 (1973); MSC/Circ. 916, MSC/Circ. 1004 and MSC/Circ. 1008.	A.1/3.18	(Nothing in addition to international instruments)
Draperies, curtains and other suspended textile materials and films	SOLAS II-2/3.40.3; FTP Code Annex 1, Part 7.	A.1/3.19	(Nothing in addition to international instruments)
Upholstered furniture	FTP Code Annex 1, Part 8; IMO Resolution A.652 (16).	A.1/3.20	(Nothing in addition to international instruments)
Bedding components	FTP Code Annex 1, Part 9; IMO Resolution A.688 (17).	A.1/3.21	(Nothing in addition to international instruments)
Fire dampers	SOLAS II-2/9.4.1.1.8, and II-2/9.7.3.1.2; FTP Code Annex 1, Part 3; IMO Resolution A.754 (18); MSC/Circ. 916.	A.1/3.22	(Nothing in addition to international instruments)
Penetrations through 'A' class divisions by electric cables, pipes, trunks, ducts etc.	SOLAS II-2/9.3.1; FTP Code Annex 1, Part 3; IMO Resolution A.754 (18); MSC/Circ. 916, and MSC/Circ. 1004.	A.1/3.26	(Nothing in addition to international instruments)
Penetrations through 'B' class divisions by pipes other than steel or copper	SOLAS II-2/9.3.2.1; FTP Code Annex 1, Part 3; IMO Resolution A.754 (18); MSC/Circ. 916, and MSC/Circ. 1004.	A.1/3.27	(Nothing in addition to international instruments)

Navigation equipment

Product item identification	**Applicable international instruments for construction, performance and testing requirements**[1]	**EC technical regulations, item number indicated in Annex A.1 of directive 96/98/EC, as amended**	**US technical regulations**
Magnetic compass	SOLAS V/19.2.1.1; IMO Resolution A.382 (X),; IMO Resolution A.694 (17); ISO 449 (1997), ISO 694 (2000), ISO 1069 (1973), ISO 2269 (1992), IEC 60945 (1996).	A.1/4.1	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.101.
Transmitting magnetic heading device (TMHD)	IMO Resolution MSC 86 (70) annex 2; IMO Resolution A.694 (17); ISO 11606 (2000), IEC 60945 (1996), IEC 61162.	A.1/4.2	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.102.
Gyrocompass	IMO Resolution A.424 (XI); IMO Resolution A.694 (17); ISO 8728 (1997), IEC 60945 (1996), IEC 61162.	A.1/4.3	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.103.
Echo-sounding equipment	IMO Resolution A.224 (VII) as amended by IMO Resolution MSC74 (69) Annex 4, IMO Resolution A.694 (17); ISO 9875 (2000), IEC 60945 (1996), IEC 61162.	A.1/4.6	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.107.
Speed and distance measuring equipment (SDME)	1994 HSC Code 13.3.2; 2000 HSC Code 13.3.2; IMO Resolution A.824 (19) as amended IMO Resolution MSC 96(72); IMO Resolution A.694 (17); IEC 60945 (1996), IEC 61023 (1999), IEC 61162.	A.1/4.7	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.105.
Rate of turn indicator	IMO Resolution A.694 (17); IMO Resolution A.526 (13); IEC 60945 (1996), IEC 61162.	A.1/4.9	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.106.
Loran-C equipment	IMO Resolution A.694 (17); IMO Resolution A.818 (19); IEC 61075 (1991), IEC 60945 (1996), IEC 61162.	A.1/4.11	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.135.
Chayka equipment	IMO Resolution A.694 (17); IMO Resolution A.818 (19); IEC 61075 (1991), IEC 60945 (1996), IEC 61162.	A.1/4.12	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.136.

Product item identification	**Applicable international instruments for construction, performance and testing requirements[1]**	**EC technical regulations, item number indicated in Annex A.1 of directive 96/98/EC, as amended**	**US technical regulations**
GPS equipment	IMO Resolution A.819 (19), IMO Resolution A.694 (17); IEC 60945 (1996), IEC 61108-1 (1994), IEC 61162.	A.1/4.14	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.130.
GLONASS equipment	IMO Resolution MSC 53 (66); IMO Resolution A.694 (17); IEC 61108-2 (1998), IEC 60945 (1996), IEC 61162.	A.1/4.15	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.131.
Heading control system HCS	SOLAS V/24.1; IMO Resolution A.342 (IX); as amended by IMO Resolution MSC 64 (67) Annex 3; IMO Resolution A.694 (17); ISO 11674 (2000), IEC 60945 (1996), IEC 61162.	A.1/4.16	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.110.
Automatic radar plotting aid (ARPA) (Radar equipment used with ARPA must have separate EU and U.S. certifications.)	IMO Resolution A.823 (19); IMO Resolution A.694 (17); IEC 60872-1 (1998), IEC 61162.	A.1/4.34	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.120.
Automatic Tracking Aid (ATA) (Radar equipment used with ATA must have separate EU and U.S. certifications.)	IMO Resolution MSC 64(67), Annex 4, Appendix 1; IMO Resolution A.694 (17); IEC 60872-2 (1999), IEC 60945 (1996), IEC 61162.	A.1/4.35	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.111.
Electronic Plotting Aid (EPA) (Radar equipment used with EPA must have separate EU and U.S. certifications.)	IMO Resolution MSC 64(67), Annex 4, Appendix 2; IMO Resolution A.694 (17); IEC 60872-3 (2000), IEC 60945 (1996), IEC 61162.	A.1/4.36	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.121.
Integrated bridge system	IMO Resolution MSC.64 (67) Annex 1; IMO Resolution A.694 (17); IEC 61209 (1999), IEC 60945 (1996), IEC 61162.	A.1/4.28	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.140.
Voyage data recorder	IMO Resolution A.861(20); IMO Resolution A.694 (17); IEC 61996 (2000), IEC 60945 (1996), IEC 61162.	A.1/4.29	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.150.
Gyro compass for high speed craft	IMO Resolution A.821 (19); IMO Resolution A.694 (17); ISO 16328 (2001), IEC 60945 (1996), IEC 61162.	A.1/4.31	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.203.

Product item identification	**Applicable international instruments for construction, performance and testing requirements**[1]	**EC technical regulations, item number indicated in Annex A.1 of directive 96/98/EC, as amended**	**US technical regulations**
Universal Automatic Identification System equipment (AIS) (In addition, the radio transmitter is required to be authorized by the U.S. Federal Communications Commission.)	IMO Resolution MSC.74 (69) Annex 3; IMO Resolution A.694 (17); ITU R. M. 1371-1 (10/00) IEC 61993-2 (2002), IEC 60945 (1996), IEC 61162	A.1/4.32	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.155.
Track control system	IMO Resolution MSC.74 (69) Annex 2; IMO Resolution A.694 (17); IEC 62065 (2002), IEC 60945 (1996), IEC 61162.	A.1/4.33	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.112.
Radar reflector	IMO Resolution A.384 (X); IEC 60945 (1996), ISO 8729 (1997).	A.1/4.39	Navigation and Vessel Inspection Circular NVIC 8-01, enclosure (4), 2/165.160.

MRA Product Scope

FTP Code Items Covered by MRA

The following tables list those "fire protection, life saving, and navigation equipment" items covered by the MRA and provides the equivalent USCG Approval category for each:

MRA Category Description	USCG Approval Category	Council Directive 96/98/EC on Marine Equipment
Primary deck coverings	164.106	A.1/3.1
"A" and "B: Class division fire integrity	164.105** (deck assembly)	A.1/3.11
	164.107** (structural insulation)	A.1/3.11
	164.108** (bulkhead panels)	A.1/3.11
Structural ceiling	164.110** (structural ceiling)	A.1/3.11
Non-combustible material	164.109	A.1/3.13
Draperies, curtains & other suspended textiles	164.111	A.1/3.19
Surface materials and floor coverings with low flame-spread characteristics	164.112*** (interior finish)	A.1/3.18
	164.117 (floor coverings)	A.1/3.18
Fire doors	164.136*	A.1/3.16*
Penetrations through 'A' class divisions by electric cables, pipes, trunks, ducts etc.	164.138	A.1/3.26
Penetrations through 'B' class divisions by electric cables, pipes, trunks, ducts etc.	164.138	A.1/3.27
Dampers	164.139	A.1/3.22
Bedding components	164.142	A.1/3.21
Upholstered furniture	164.144	A.1/3.20
Fire door control systems	164.146	A.1/3.17

* Limited to fire doors without windows and doors with total window area of 645 cm^2,or less, in each door leaf. Approval limited to maximum door size tested. Doors must be used with a fire tested frame design.

** Does not include "A" or "B" class windows.

*** Limited to exposed surfaces of ceilings, walls, and floors. Does not apply to pipes, pipe coverings, or cables.

LSA Code Items Covered by MRA

MRA Category Description	USCG Approval Category	Council Directive 96/98/EC on Marine Equipment
Lifebouy Self Activating Smoke, 15-minute (pyrotechnics)	160.157*	A.1/1.3
Rocket parachute flare (pyrotechnics)	160.136*	A.1/1.8
Hand flares (pyrotechnics)	160.121*	A.1/1.9
Buoyant smoke signal, 3-minute (pyrotechnics)	160.122*	A.1/1.10
Line-throwing appliances (pyrotechnics)	160.040*	A.1/1.11
Rigid liferaft	160.118+	A.1/1.13
Automatically self-righting rigid liferaft	160.118+	A.1/1.14
Canopied reversible rigid liferafts	160.118+	A.1/1.15
FLOAT free (hydrostatic release units)	160.162	A.1/1.16
Release Mechanism for lifeboats, rescue boats, liferafts launched by a fall or falls.	160.133@	A.1/1/26
Marine Evacuation system	160.175	A.1/1.27

* Expiration date not to exceed 48 months after month of manufacturer.
+ The emergency pack is not covered by the MRA.
@ Limited to davit-launched liferaft automatic release hook.

Navigation Equipment Covered by MRA

MRA Category Description	USCG Approval Category	Council Directive 96/98/EC on Marine Equipment
Magnetic compass	165.101	A.1/4.1
Transmitting Magnetic Heading Device, TMHD (formerly Electromagnetic compass)	165.102	A.1/4.2
Gyrocompass	165.103	A.1/4.3
Echosounding equipment	165.107	A.1/4.6
Speed and distance indicating device	165.105	A.1/4.7
Rate of turn indicator	165.106	A.1/4.9
Loran-C equipment	165.135	A.1/4.11
Chayka equipment	165.136	A.1/4.12
Global positioning system (GPS) equipment	165.130	A.1/4.14
Global navigation satellite system (GLONASS) equipment	165.131	A.1/4.15

Heading control system	165.110	A.1/4.16
Automatic radar plotting aid (ARPA)[1]	165.120	A.1/4.34
Auto-Tracking Aid[2]	165.111	A.1/4.35
Electronic Plotting Aid[3]	165.121	A.1/4.36
Integrated bridge system	165.140	A.1/4.28
Voyage data recorder (VDR)	165.150	A.1/4.29
Gyrocompass for High Speed Craft	165.203	A.1/4.31
Shipborne automatic identification system (AIS)	165.155*	A.1/4.32*
Track Control	165.112	A.1/4.33
Radar reflector	165.160	A.1/4.39

[1] Radar equipment used with ARPA must have separate EU and U.S. Certifications.
[2] Radar equipment used with ATA must have separate EU and U.S. Certifications.
[3] Radar equipment used with EPA (Electronic Plotting Aid) must have separate EU and U.S. Certifications.
*Radio transmitter is required to be authorized by U.S. Federal Communications Commission (FCC).

Radars are not covered by the MRA. Only associated radar equipment such as ARPA, ATA, and EPA are included in the MRA. The USCG does not approve radars. In the U.S., the Federal Communications Commission (FCC) is responsible for the certification of radars. Therefore, the manufacturers of radars must obtain the FCC certification independently from the USCG approval process. For example, a European manufacturer may have a radar unit that includes the ARPA feature and would like to supply it to a US Flag vessel. This leads to two situations:

(1) If the manufacturer has the MED authorization for the ARPA feature, then they may also obtain USCG approval of the ARPA under the MRA. However, the manufacturer must obtain the FCC certification on the radar before the combination radar/ARPA unit is installed on the U.S. vessel.

(2) If the manufacturer has the USCG approval for the ARPA feature, then they may also obtain the wheelmark for the ARPA under the MRA. However, the manufacturer must obtain the [European approval] of the radar separately.

Shipborne automatic identification systems (AIS) contain radio transmitters and therefore must be type approved by the Federal Communications Commission under Subpart J of 47 CFR 2. Prior to FCC authorization; the shipborne AIS design, test reports, and quality system audit should be reviewed by the Coast Guard, in accordance with the procedures in this directive. The Coast Guard will provide a USCG certificate of approval. The Coast Guard will transmit a copy of this approval to the FCC for its use in approving the equipment.

Declaration of Conformity

The manufacturer's "Declaration of Conformity" is a legal written testimony declaring that the product stated thereon meets the requirements of the Directive and is to include the information specified. Manufacturers may be requested to supply a "declaration of conformity" when supplying products to the European market. Such a declaration is to be drafted by the manufacturer and **could** take the following form:

EUROPEAN COMMUNITY
DECLARATION OF CONFORMITY

Issued in compliance with the
Marine Equipment Directive (MED) 96/98/EC with amendments
as agreed in the US-EC Mutual Recognition Agreement (MRA)

(Manufacturers Name)
(Manufacturers address)
(Manufacturers address)
(Manufacturers address)

declares that the product described below conforms to type as allowed by the "Agreement between the United States of America and the European Community on Mutual Recognition of Certificates of Conformity for Marine Equipment" signed February 27th, 2004.

Product Name: _____

MED Annex A.1: Item No. _____
Item designation _____

Product Serial Number or Batch/Lot No.: _____

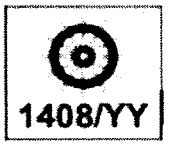
U.S. Coast Guard Approval No.: _____

Signature:

Name:

Position Title:

Date:



This declaration is issued under the sole responsibility of the manufacturer and, if applicable, the authorized representative.