	REFERENCE:	RCD - GN - 01	ISSUE:	02
	TITLE:	RCD Conformity Assessment Modules		



1 INTRODUCTION

1.1. The Recreational Craft Directive was one of the very first Global Approach Directives which means that it has “standard” certification procedures. These procedures are known as Conformity Assessment MODULES.

1.2. This document explains the modules and how they must or may be applied for craft CE marking to the RCD.

2 THE MODULES

ID	Title	Assessment/Certification	Scope
A	Internal Production Control	No Notified Body involvement. Complete self-certification by the manufacturer	Only permitted for craft in design category D & craft in category C with $L_H < 12m$
Aa (RCD I) A1 (RCD II)	Internal Production Control + Supervised Product Testing	<i>Examination Report</i> from the Notified Body covering only stability and buoyancy assessment of the <u>model</u> . This report is not specific to an individual boat. The manufacturer self-certifies all other requirements of the RC by signing the Declaration of Conformity for each boat.	Required for craft in category A & B with $L_H < 12m$. (Manufacturers may voluntarily upgrade from module A to Aa/A1.)
B+	EC/EU Type Examination	EU (EC in RCD I) Type Examination Certificate from Notified Body covering all requirements of RCD for the model. The certificate is not specific to an individual boat. NOTE: module B is a “design” assessment and must be combined with another module (C or F) which covers production.	One (combination) mandatory for craft in categories A, B or C with $L_H \geq 12m$. (Manufacturers may voluntarily upgrade from modules A or Aa/A1 to module B+ or G.)
+C	Conformity to Type based on internal production control	This module covers only the production phase and so must be combined with module B for design. There is no Notified Body involvement in module C. The manufacturer signs the Declaration of Conformity to indicate that the boat has been built to the design already approved by the Notified Body under module B.	
+F	Product Verification	This module covers only the production phase and so must be combined with module B for design. The Notified Body must inspect samples of production to check that it conforms to the design approved under module B. A Certificate of Conformity is issued for each batch or samples inspected. (This module is mostly used for models of boats which may be customised and a certificate is issued for each boat).	
G	Unit Verification	Notified Body issues a Certificate of Conformity covering all design & production requirements of RCD, specific to the individual boat. This applies to one-off custom boats.	

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2.1 In the above table, HPiVS has excluded the quality assurance modules (D, E & H). While many boat builders follow quality systems, experience has shown that QAS is difficult to use for the purpose of RCD compliance.

2.2. The module for Post Construction Assessment has also been excluded from the table as this is never an option: it may not be used by manufacturers and is mandatory for importers.


2.3. In every case, whatever the involvement of a Notified Body, the manufacturer must produce a Technical File that describes the boat and how it complies with the requirements of RCD. This must be kept for 10 years after production of the last boat. It must be shown to an authority, should they request to see it.

3 MODULAR CHOICE

3.1. A manufacturer may choose a “higher” module. For example, a manufacturer of a small boat that may be permitted to use module A may wish to have the confidence and marketing status offered by a Notified Body certificate. He may choose to apply module Aa/A1, G or B+(C or F).

3.2. For craft longer than 12m in category A, B or C, the manufacturer may choose between modules G or B+(C or F). Module G applies for one-off boats but for production builders, the cheapest certification route is modules B+C since there is no Notified Body involvement in module C. Not only is this cheapest but the type approval certificate is valid for all boats that the manufacturer builds to the (module B) approved design. So why would a manufacturer choose to apply the more expensive module F rather than C? Confidence! As time goes by, production will change a bit, the design may change a bit and standards may be updated. If boats are built semi-customised, this can also add complexity to controlling compliance. With all of these factors at play, a manufacturer may feel more comfortably paying a little more to have each boat or batch of boats, checked by a Notified Body. It also provides each boat’s owner with a certificate specific to their individual boat. Note that for module F, only a check of production is required of the Notified Body: not a whole design review. So module F is not as expensive as it may seem.

3.3. HPiVS has had experience where a manufacturer applying modules B+C has been asked by a boat owner, after production, to have their hull number printed on their Notified Body certificate. While this seems a trivial request, it is not permitted as it implies the Notified Body has been involved in verifying the production of that vessel. This is not the case for modules B+C. If this is required, HPi must inspect the vessel and issue a module F Certificate of Conformity that will be specific to that boat.

 HPi VS <small>HPi Verification Services</small>	REFERENCE:	RCD - GN - 01	ISSUE:	02
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4 GLOSSARY

Design Category	<p>A (defined as 'ocean' in RCD I) significant wave > 4m</p> <p>B (defined as 'offshore' in RCD I) significant wave up to 4m</p> <p>C (defined as 'inshore' in RCD I) significant wave up to 2m</p> <p>D (defined as 'sheltered waters' in RCD I) significant wave of 0.3m with the ability survive an occasional wave of 0.5m.</p>
L _H	Hull Length as defined in ISO 8666.