



COMDTPUB P16700.4
NVIC 02-19
01 NOV 2019

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 02-19

Subj: GUIDE TO MARINE EQUIPMENT APPROVALS COVERED BY A MUTUAL RECOGNITION AGREEMENT (MRA)

1. PURPOSE.

- a. This document supersedes and cancels Navigation and Vessel Inspection Circular (NVIC) No. 08-04, Change 1 and provides guidance on the parallel agreements the United States of America (US) has with the European Community (EC) and with the European Free Trade Association (EFTA) countries which are part of the European Economic Area (EEA) on the Mutual Recognition of Certificates of Conformity for Marine Equipment as allowed by Title 46 Code of Federal Regulation (CFR) subpart 159.003.
- b. The objectives of the two mutual recognition agreements (MRAs) are to facilitate US - EC and US – EEA EFTA trade in marine equipment and to promote bilateral cooperation on international marine equipment regulations. The two agreements allow a manufacturer to reach both the US and European (EC and EEA EFTA member states) markets on the basis of demonstrating compliance with one set of regulatory requirements. This can directly lead to a reduction of costs for manufacturers in terms of testing and certification.
- c. The two agreements are commonly referred to as the “MRA on marine equipment” and are simply referred to as the “MRAs” in this Navigation and Vessel Inspection Circular. The mutual recognition agreement between the US and the EC was signed on February 27, 2004 and became effective on July 1, 2004. The mutual recognition agreement between the US and Norway, Iceland and Liechtenstein, which represent the EEA EFTA member states was signed on October 17, 2005, and became effective on March 1, 2006.

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The European regulations governing marine equipment were updated in 2014, and as a result, these agreements were updated. The updated agreements became effective on February 18, 2019, and February 22, 2019, respectively. The updated agreements with the EC, signed by the European Union (EU), and EFTA also expanded the types of equipment covered under the MRA. This circular describes how the MRA will work, answers some anticipated questions regarding the process for obtaining approval using the MRA, and how to determine compliance.

2. ACTION.

- a. Officers in Charge, Marine Inspections (OCMI) 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.
- b. Coast Guard marine inspectors, Recognized Organizations (RO) 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 holding, USCG approval are encouraged to review the guidance contained in this Circular to determine if the MRAs will permit their particular product to be approved in accordance with the European Directive on Marine Equipment (Council Directive 2014/90/EU as amended on Marine Equipment).

3. DIRECTIVE AFFECTED. NVIC 08-04, Change 1 is cancelled.

4. BACKGROUND.

- a. 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 and in February 2004, the United States and the EEA EFTA States (Norway, Iceland and Liechtenstein) initiated negotiations on a MRA to parallel the 1998 US - EC MRA. The Lifesaving and Fire Safety Division (CG-ENG-4) worked in close cooperation with USTR to develop the MRA product scope based on a detailed product-by-product review of the US and EC marine equipment requirements. Many of the US, EFTA and EC marine equipment requirements are based on standards and testing specified by the Safety of Life At Sea Convention (SOLAS). Only products having identical or equivalent requirements in each market were included in the scope of the agreement.
- b. Since the genesis of the MRAs, the regulatory landscape has changed. A new Marine Equipment Directive (MED) became effective September 2016, repealing the previous Directive. New Coast Guard regulations and policies have harmonized many approvals with international instruments. Based on years of continued experience with the Agreements and the increased regulatory alignment, additional navigation equipment,

position indicating lights, structural fire protection for high speed craft, and other miscellaneous items were identified to include in these updated agreements.

- c. Additionally, 46 CFR Subchapter Q was updated to codify the procedures for obtaining USCG approval under the MRAs in 46 CFR subpart 159.003. Sections 159.003–3 and 159.003–5 of this subpart specify that the Coast Guard can accept foreign approvals under the MRAs and may issue approvals under the MRAs.

5. DISCUSSION.

- a. The two agreements allow reciprocal approvals to be given by the US and Europe 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 (EU and EEA EFTA Member States) approval through one review process.
- b. For example, a manufacturer having a USCG approval for a hand flare distress signal is eligible to obtain European approval without further testing. In this case, the manufacturer would make application to the Coast Guard. The Coast Guard would authorize the use of the European mark of conformity (wheelmark) based on the MRA and update the certificate of approval. The manufacturer will then be able to sell the product in both EU and EEA EFTA member states.
- c. 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 approval certificate. Manufacturers who obtain USCG approval through the MRA will have their products design and production evaluated by a Notified Body. This process is similar to the USCG approval process. Additionally, The MED requires each EU or EFTA Member State is required to establish and maintain a Market Surveillance program to identify and mitigate non-conformities in marine equipment. The Market Surveillance Authorities meet biannually to coordinate efforts and share product information. CG-ENG actively participates in this process. Enclosure (1) provides a more detailed description of the EU and EFTA approval process.
- d. The product scope of the two MRAs includes 69 products in three categories: lifesaving, fire protection, and navigational equipment. Enclosure (2) is a reference table with the USCG approval category. Some marine products requiring approval were not included because equivalence could not be determined; therefore, products will not be accepted as “USCG approved” simply based on European approval markings (the wheelmark).
- e. Manufacturers who obtain EU and EEA EFTA approval through the Coast Guard need to provide a declaration of conformity for the product in compliance with the MED. Manufacturers should review the current EU declaration of conformity requirements.
- f. Manufacturers that receive approval from the Coast Guard for their product under the MRA will affix a wheelmark and a USCG Approval number to their product. The

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wheelmark indicates that the product has obtained approval under the US - EC MRA and the US – EEA EFTA MRA.

- g. The MRAs do not change the requirements of vessel owners and operators to use USCG approved equipment where required on US flag vessels. However, they do allow vessel owners and operators to purchase and install equipment that has been approved (issued a wheelmark and a USCG Approval number) under the requirements of the MRAs by an EU or EEA EFTA Notified Body. OCMI's and RO's acting on behalf of the Coast Guard will continue to require USCG approval where required by the applicable regulations.
 - h. Should a product be found to not comply with the applicable standards or can pose an imminent danger to health, safety or the environment, the MRAs have a provision for a two-way alert system, which will be used to pass information quickly on such products and initiate corrective action.
6. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is it itself a regulation. It is not intended to nor does it impose legally-binding requirements on any party. It represents the Coast Guard's current thinking on this topic and is issued for guidance purposes to outline methods of best practice for compliance to the applicable law. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations.
7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.
- a. The development of this NVIC and the general policies contained within it have been thoroughly reviewed by the originating office, and are categorically excluded (CE) under current DHS Categorical Exclusion A3 from further environmental analysis, in accordance with Chapter 3 B. and Table 3-1 of the National Environmental Policy Act Implementing Procedures and Policy for Considering Environmental Impacts, COMDTINST 5090.1 (series). Because this NVIC implements, without substantive change, the applicable Commandant Instruction or other federal agency regulations, procedures, manuals, and other guidance documents, Coast Guard categorical exclusion #A3 is appropriate.
 - b. This NVIC will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any Federal, State, or local laws or administrative determinations relating to the environment. All future specific actions resulting from the general policies in this NVIC must be individually evaluated for compliance with the National Environmental Policy Act (NEPA), DHS and Coast Guard NEPA policy, and compliance with all other environmental mandates.
8. DISTRIBUTION. No paper distribution will be made of this NVIC. An electronic version will be located at <https://www.dco.uscg.mil/Our-Organization/NVIC/>.
9. RECORDS MANAGEMENT CONSIDERATIONS. This NVIC has been thoroughly reviewed during the directives clearance process, and it has been determined there are no

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further records scheduling requirements, in accordance with the Federal Records Act (44 U.S.C. 3101 et seq.), NARA requirements, and the Information and Life Cycle Management Manual, COMDTINST M5212.12 (series). This policy does not create significant or substantial change to existing records management requirements.

10. FORMS/REPORTS. None.

11. REQUEST FOR CHANGES. All requests for changes and questions regarding implementation of this NVIC and/or requests for changes should be directed to the contact Life Saving and Fire Safety Division (CG-ENG-4) staff at TypeApproval@uscg.mil.



R. V. TIMME
Rear Admiral, U.S. Coast Guard
Assistant Commandant for Prevention Policy

Encl: (1) Guide to Mutual Recognition Agreement
(2) MRA Product Scope with USCG Approval Categories

Guide to US - EC and US – EEA EFTA Mutual Recognition Agreements (MRA)

1.0 Introduction

The United States (US) and the European Community (EC) agreement and the United States and the European Economic Area (EEA) of the European Free Trade Association (EFTA) agreement aim to simplify matters for manufacturers that wish to have both U.S. Coast Guard (USCG) approval and the European certificates of conformity (see definition). The two Mutual Recognition Agreements on Marine Equipment are a result of a 7-year cooperative effort that recognizes the importance of facilitating US - European trade in marine equipment and promoting bilateral cooperation on international marine equipment regulations. With the experience gained with the MRAs and the increased regulatory alignment, the categories of equipment covered by the initial MRAs was expanded from 43 product categories to 69 product categories. The MRAs 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 MRAs.

1.1 MRA Terms & Definitions

Administration: 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 fulfills the relevant legislative, regulatory and administrative requirements of that Party. In the U.S., this is the Certificate of Approval issued by the United States Coast Guard. In the EC and in EFTA states, they are the certificates, approvals and declarations required by Directive 2014/90/EU and Implementing Regulation 2017/306.

Conformity Assessment Body: means a legal entity, whether a Regulatory Authority or another 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 2014/90/EU;
- 2) The Notified Bodies designated by the EEA EFTA Member States under Directive 2014/90/EU;
- 3) The U.S. Coast Guard.

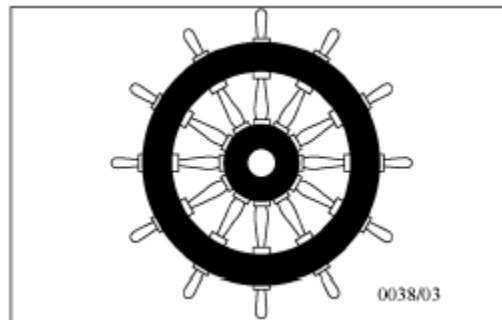
Declaration of Conformity: a descriptive document issued by the manufacturer under the MED system and provided to the customer.

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 2014/90/EU of 23 July 2014 on marine equipment, as amended. Commonly referred to as the **MED**.

MarED: the coordination 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: also commonly referred to as the “Wheelmark” is a marking affixed to products approved by the USCG, an EC or EEA EFTA Notified Body under the MRA 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. Under the MRAs the USCG is considered a Notified Body.

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.” The USCG Notified Body Number is 1408.

International instrument: means the relevant international conventions, resolutions and circulars of the International Maritime Organization (IMO), and the relevant testing standards. (for example, 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 MRAs.

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, the European Community member states and European Economic Area European Free Trade Association member states.

1.2 Benefits of the MRAs

The current product scope of the MRAs includes 69 products in three main categories: lifesaving equipment (for example, visual distress signals, marine evacuation systems); fire protection equipment (for example, fire doors, insulation); and navigational equipment (for example, compasses, GPS equipment, echo-sounding equipment). The MRAs allow a manufacturer to reach multiple markets on the basis of compliance with one set of regulatory requirements. This can directly lead to a reduction of costs for manufacturers for testing and certification, and provide ship owners, builders, and operators with a wider selection of equipment providing more flexibility when designing, building, and operating their vessels. The agreement also contemplates expanding the product scope in the future for items where it can be agreed that the requirements are equivalent.

1.3 Gaining Approval via the MRA

The specific regulatory authority for the Coast Guard to accept foreign approved equipment is Subpart 159.003 of 46 CFR. This sets out the procedures for the Coast Guard to approve equipment via the MRAs. The complete listing of eligible products are contained in Annex II of the MRAs (see <https://www.dco.uscg.mil/CG-ENG-4/MRA/>). Additionally, Enclosure (2) provides the product scope of these MRA's and the associated USCG Approval Categories.

The following table is intended to help manufacturers understand the various scenarios when seeking approval via the MRA:

Scenario		Gaining Approval via the MRAs
Manufacturer currently holds the mark of conformity for an item covered by the MRAs (that is, an item listed in Annex II of MRAs) 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 mark of conformity.
Manufacturer currently has USCG approval for an item covered by the MRAs (that is, an item listed in Annex II of MRAs) but does not have the mark of conformity.	→	If manufacturer wishes to have the mark of conformity, an application should be made to the USCG. A USCG Certificate of Approval will be reissued to show that the manufacturer is eligible to apply the mark of conformity to the product as allowed under the MRAs.
Manufacturer currently has two certificates for a particular item it produces. One issued by the USCG and the other by a EC or EEA EFTA Notified Body. The item in question is covered by the MRAs (meaning listed in Annex II of MRAs). The manufacturer wishes to maintain both approvals independently.	→	The MRAs do 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 MRAs (i.e., not listed in Annex II of MRAs). Manufacturer desires type approval.	→	MRAs are not applicable. Manufacturer should seek type approval for the specific market for which they wish to sell (e.g., USCG, European, or both)
Manufacturer currently has both USCG approval and the mark of conformity. 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 MRAs (i.e., listed in Annex II of MRAs)	→	Manufacturer may decide to terminate one of the type approvals and then get it back based on the MRAs. For example, the manufacturer could terminate the USCG approval and then submit for a new USCG approval from the Notified Body that issued the relevant MED certificates authorizing the mark of conformity. Please note that a manufacturing company cannot maintain two USCG approvals for the same product at the same time - one approval issued under the MRA by an EC or EEA EFTA Notified Body and the other issued by the USCG.
Manufacturer has USCG approval and does not wish to have the mark of conformity.	→	The MRAs do not apply. No action is needed. Simply continue to comply with USCG requirements for approval.

<p>Manufacturer has mark of conformity and does not wish to have the USCG approval.</p>	<p>→</p>	<p>The MRAs do not apply. No action is needed. Continue to comply with requirements for maintaining the mark of conformity.</p>
<p>Manufacturer has neither approval. Manufacturer wishes to have both USCG approval and the mark of conformity.</p>	<p>→</p>	<p>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 MRAs.</p>

2.0 Markings

2.1 Product Numbering and Markings

The MRAs do not contain specific provisions for the European and the US to mutually accept each other’s approval marks. Instead, the two MRAs allow the US – EC and US – EEA EFTA 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.

Maintaining the respective marking requirements avoids confusion since not all equipment is covered by the MRAs. 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 MRAs that have received approval through the MRAs will have both EC/EFTA and USCG markings.

2.2 Equipment receiving USCG Approval from the EC/EEA EFTA

EC and EEA EFTA Notified Bodies acting under the authority of the US-EC MRA or the US-EEA EFTA MRA are permitted to issue USCG approval numbers for products covered by the MRAs. 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 and EEA EFTA product approval process. Notified Bodies conduct design and production evaluations that are similar to the USCG approval process. An EC Type Examination (Module B) Certificate indicates that design review was completed and a QA Certificate of Conformity (Module D, E, F, or G) indicates that production evaluation (follow up) is accepted. Generally, Notified Bodies conduct the design and production evaluations and issue the associated certificates. However, there are cases when the approval of the design is conducted by one Notified Body and the approval of the production evaluation is conducted by a second Notified Body. Only the Notified Body that conducted the conformity assessment is authorized to allocate a USCG Approval Number.

For all cases, the EC Type Examination (Module B) Certificate should include the following paragraph:

“This equipment is covered by the scope of 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 and amended by Decision No.1/2018 dated February 18th, 2019 according to U.S. Coast Guard approval category <USCG Approval Category>. A U.S. Coast Guard approval number will be assigned to the equipment when the production module has been completed and will appear on the production module certificate (module D, E or F) as allowed by the MED.”

For cases when the same Notified Body issues both certificates, the Notified Body assigns a USCG approval number on the Module D, E & F Certificates and includes the following paragraph:

“The manufacturer is allowed to affix the US Coast Guard approval number <USCG Approval Category/NB 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 and amended by Decision No.1/2018 dated February 18th, 2019”

For example; a USCG approval number listed on the Module D, E, F, or G Certificates for a non-combustible material and a Notified Body number (NB number) with the number “0038” is: **164.109/EC0038/zzz** where “zzz” is the Unique Identifier for this product.

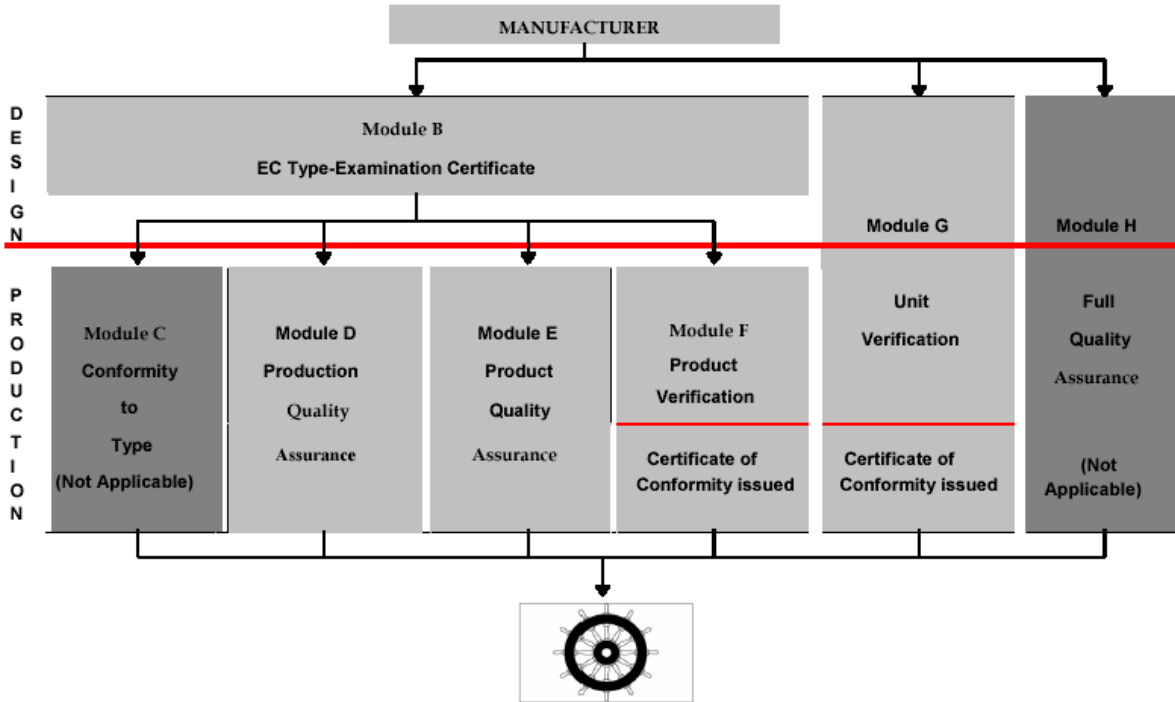
For cases when the Notified Body conducting the approval to Module B is different than the Notified Body conducting the quality assurance under Module D, E or F, the Certificate of Conformity (Module D, E or F) should be issued by the Notified Body (NB2) with the EC-US MRA marking required and the following paragraph:

“The manufacturer is allowed to affix the US Coast Guard approval number <USCG Approval Category/NB1 number/Unique Identifier/NB2 number> 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 and amended by Decision No.1/2018 dated February 18th, 2019”

For example: where there are two notified bodies involved in the approval process for a non-combustible material and the Notified Body #1 (NB1 number) which issued the Module B Certificate and has the notified body number “0038” and Notified Body #2 (NB2 number) which issued Module D Certificate and has the notified body number “1121” the USCG Approval Number on the Module D Certificate is: **164.109/EC0038/zzz/EC1121** where “zzz” is the unique identifier for this product.

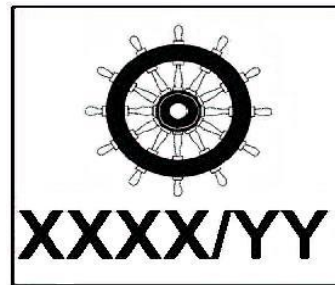
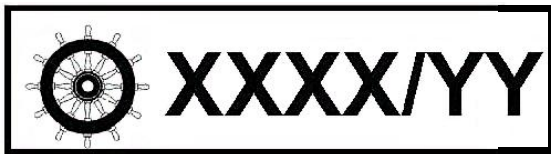
The unique identifier can only be issued after both modules are completed and only by NB2 on their Module D, E, or F certificate.

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



2.3 Equipment receiving EC and EEA EFTA Approval from the USCG

Manufacturers obtaining authorization to apply the mark of conformity 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 mark of conformity:



- 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 product is produced. The year may be applied as YYYY (2019) or YY(19).
- 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 both EC and EFTA member state vessels.

For example:



1408/YY

The manufacturer is allowed to affix the Mark 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 2004 as amended on February 18th, 2019 and by the “Agreement between the European Free Trade Association countries which are part of the European Economic Area and the United States of America on Mutual Recognition of Certificates of Conformity for Marine Equipment” signed October 2005 as amended on February 22th, 2019. Item complies with requirements of Item No. MED/#.##(x) of the directive.

Where MED/#.##(x) is the item number or EC and EEA EFTA approval category equivalent for each product covered by the MRA as listed in Enclosure (2). A copy of the MRAs can be found on our website at <https://www.dco.uscg.mil/CG-ENG-4/MRA/>.

3.0 Finding approved products

3.1 Products Approved by the USCG

Under the MRAs, the EC nations, EEA EFTA nations and the US agree to make available to the public their lists of products for which they have issued Certificates of Conformity.

The Coast Guard accomplishes this via the Coast Guard Marine Information Exchange (CGMIX) website at: <http://cgmix.uscg.mil/Equipment/>. CGMIX has a search option to specifically locate products that are issued an approval under the MRAs by the USCG. The mark of conformity 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. 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. Paragraph 3.2 outlines how to find USCG approved equipment which is approved by a European notified body under the MRA

3.2 Products approved by European Notified Bodies

The EC and EEA EFTA will post the list of products they have approved under the MRA on their Marine Equipment Directive (MarED) website at www.MarED.org. 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. Access to the product database on the MarED website is available to the public; however, 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 European Union flagged merchant vessels according to the European MED.
- Read the text of the MED and associated annexes.

If there are any questions or concerns with products approved by the EC or EEA EFTA for the USCG, please contact the CG-ENG-4 staff at TypeApproval@uscg.mil.

4.0 Manufacturer’s Information

Manufacturers will play an important part in making the MRAs 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 mark of conformity 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. Manufacturers should review the most current EC regulations to ensure the most up to date requirements for declarations of conformity.

5.0 Summary

To summarize, the important points regarding the US - EC MRA and the US – EEA EFTA MRA are as follows:

- The MRAs (Annex II) specifically identifies which items are covered.
- The US – EC MRA went into effective July 1st, 2004 and was amended February 18th, 2019.
- The US – EEA EFTA MRA is effective March 1st, 2006 and was amended February 22nd, 2019.

- The USCG will not accept the MED mark of conformity 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 or EEA EFTA notified bodies.
- Equipment that receives a USCG approval number from a European Notified Body under the MRA can be installed onboard a US flag vessel where applicable.
- Equipment that receives the mark of conformity from the USCG under the MRA can be installed where applicable onboard a European flag vessel of a country that is a member of the EC or the EEA EFTA.
- A manufacturer having the MED mark of conformity will make application for USCG approval to the notified body that issued the MED certificates authorizing the mark of conformity or they can apply to the USCG and receive a certificate under the MRA.
- A manufacturer having a USCG approval will make application for the MED mark of conformity to the Coast Guard or can cancel the current USCG approval and apply for an approval of the product from a European Notified Body under the MRA.

Lifesaving appliances

Product item identification	USCG Approval Category	MED Number and item designation
Position- indicating lights for life- saving appliances: (a) for survival craft and rescue boats (New Item)	161.101	MED/1.2a
Position- indicating lights for life- saving appliances: (b) for lifebuoys (New Item)	161.110	MED/1.2b
Position- indicating lights for life- saving appliances: (c) for lifejackets (New Item)	161.112	MED/1.2c
Lifebuoy self- activating smoke signals Note: Expiration date not to exceed 48 months after month of manufacture.	160.157	MED/1.3
Rocket parachute flares (pyrotechnics) Note: Expiration date not to exceed 48 months after month of manufacture.	160.136	MED/1.8
Hand flares (pyrotechnics) Note: Expiration date not to exceed 48 months after month of manufacture.	160.121	MED/1.9
Buoyant smoke signals (pyrotechnics) Note: Expiration date not to exceed 48 months after month of manufacture.	160.122	MED/1.10
Line- throwing appliances Note: Expiration date not to exceed 48 months after month of manufacture.	160.040	MED/1.11
Rigid liferafts Note: The emergency pack is not covered by the Agreement	160.118	MED/1.13
Automatically self- righting liferafts (rigid liferafts only/inflatable liferafts not covered) Note: The emergency pack is not covered by the Agreement	160.118	MED/1.14
Canopied reversible liferafts (rigid liferafts only/inflatable liferafts not covered) Note: The emergency pack is not covered by the Agreement	160.118	MED/1.15

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Product item identification	USCG Approval Category	MED Number and item designation
Float- free arrangements for liferafts (hydrostatic release units)	160.162	MED/1.16
Release mechanism for: (a) Lifeboats and rescue boats (launched by a fall or falls) Limited to Davit- launched liferaft automatic release hook	160.170	MED/1.26 (a)
Release mechanism for : (b) Liferafts (launched by a fall or falls) Limited to Davit- launched liferaft automatic release hook	160.170	MED/1.26 (b)
Marine evacuation systems	160.175	MED/1.27
Embarkation Ladders (New Item)	160.117	MED/1.29
Retro- reflective materials (New Item)	164.018	MED/1.30

Fire protection

Product item identification	USCG Approval Category	MED Number and item designation
Primary decks covering	164.106	MED/3.1
'A' & 'B' Class divisions fire integrity (a) 'A' class divisions,	164.105 (deck assembly)* 164.107 (structural insulation)*	MED/3.11 (a)
'A' & 'B' Class divisions fire integrity (b) 'B' class divisions. Note: Restricted 'B' Class divisions are not covered by this agreement.	164.108 (bulkhead panels)* 164.110 (structural ceiling)*	MED/3.11 (b)
Non- combustible materials	164.109	MED/3.13
Fire doors Limited to fire doors without windows or with total window area no more than 645 cm2 in each door leaf. Approval limited to maximum door size tested. Doors must be used with a fire tested frame design. Note: Restricted 'B' Class doors are not covered by this agreement.	164.136	MED/3.16

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

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Product item identification	USCG Approval Category	MED Number and item designation
Fire door control systems components. Note: When the term “system components” is used in column 1 it may be that a single component, a group of components or a whole system needs to be tested to ensure that the international requirements are fulfilled.	164.146	MED/3.17
Surface materials and floor coverings with low flame- spread characteristics (a) decorative veneers.	164.112	MED/3.18 (a)
Surface materials and floor coverings with low flame- spread characteristics (b) paint systems.	164.112	MED/3.18 (b)
Surface materials and floor coverings with low flame- spread characteristics (c) floor coverings.	164.117	MED/3.18 (c)
Surface materials and floor coverings with low flame- spread characteristics (f) combustible ducts.	164.112	MED/3.18 (f)
Draperies, curtains and other suspended textile materials and films	164.111	MED/3.19
Upholstered furniture	164.144	MED/3.20
Bedding components	164.142	MED/3.21
Fire dampers	164.139	MED/3.22
Penetrations through ‘A’ class (a) electric cable transits.	164.138	MED/3.26 (a)
Penetrations through ‘A’ class (b) pipe, duct, trunk, etc penetrations	164.138	MED/3.26 (b)
Fire restricting materials (except furniture) for high speed craft (New item)	164.201	MED/3.32
Fire restricting materials for furniture for high speed craft (New item)	164.201	MED/3.33
Fire resisting divisions for high speed craft (New item)	164.207	MED/3.34

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Navigation equipment

Product item identification	USCG Approval Category	MED Number and item designation
Magnetic compass Class A for ships	165.101	MED/4.1
Transmitting heading device THD (magnetic method) Note: The use of ISO 11606:2000/Cor 1:2005 is required for Acceptance for USCG Approval under the MRA	165.102	MED/4.2
Gyro compass	165.103	MED/4.3
Echo - sounding equipment	165.107	MED/4.6
Speed and distance measuring equipment (SDME)	165.105	MED/4.7
Rate- of- turn- indicator	165.106	MED/4.9
GPS equipment	165.130	MED/4.14
GLONASS equipment	165.131	MED/4.15
Heading control system (HCS)	165.110	MED/4.16
Rudder Angle Indicator (New item)	165.167	MED/4.20
Propeller revolution indicator (New item)	165.168	MED/4.21
Pitch Indicator (New item)	165.169	MED/4.22
Radar equipment CAT 1 (Radar equipment used with ARPA must have separate EU and USA certifications)	165.115	MED/4.34
Radar equipment CAT 2 (Radar equipment used with ATA must have separate EU and USA certifications)	165.116	MED/4.35
Radar equipment CAT 3 (Radar equipment used with EPA must have separate EU and USA certifications)	165.117	MED/4.36
Voyage data recorder (VDR)	165.150	MED/4.29
Electronic chart display and information system (ECDIS) with backup, and raster chart display system (RCDS) (New item)	165.123 (ECDIS) 165.124 (ECDIS Back-up Equipment)	MED/4.30
Gyro compass for high- speed craft	165.203	MED/4.31
Universal automatic identification system equipment (AIS)	165.155	MED/4.32
Track control system (working at ship's speed from minimum manoeuvring speed up to 30 knots)	165.112	MED/4.33
Radar equipment for high speed craft applications (CAT 1H and CAT 2H) (New item)	165.216 (CAT 1H) 165.217 (CAT 2H)	MED/4.37
Radar reflector passive type	165.160	MED/4.39

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Product item identification	USCG Approval Category	MED Number and item designation
Heading control system for high speed craft (New Item)	165.210	MED/4.40
Transmitting heading device THD (GNSS method) (New item)	165.102	MED/4.41
Searchlight for high speed craft (New item)	165.252	MED/4.42
Night vision equipment for high speed craft (New item)	165.251	MED/4.43
Transmitting heading device THD (Gyroscopic method) (New item)	165.102	MED/4.46
Simplified voyage data recorder (S- VDR) (New item)	165.151	MED/4.47
DGPS Equipment (New item)	165.132	MED/4.50
DGLONASS Equipment (New item)	165.133	MED/4.51
Daylight signalling lamp (New item)	165.166	MED/4.52
Bridge Navigational Watch Alarm System (BNWAS) (New item)	165.142	MED/4.57
Sound reception system (New item)	165.165	MED/4.58