











This essential guide, intended for manufacturers LSA devices subject to Directive 2014/90/EU (MED), provides a concise overview the assessment and certification methods available for obtaining the CE (Wheel Mark) for their products. It serves as a brief compendium clarifying the key differences between "EC Module Type **Examination**" and **Module** G "Conformity Based Unit on Verification." The focus on these two evaluation modulesexcluding Modules D and E (related to quality management systems) F Module and (for production)—stems series from the fact that manufacturers often lack

Close collaboration between the UDICERUII technical wanties and the manufacturer, starting even before the product convergence of the product convergence of the product convergence of the best certification choices for an LSA device hope imaging to the production type.

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#### KEY DIFFERENCES BETWEEN MODULE B AND G

- Module B EC Type Examination
- Module G Conformity Based on Unit Verification

Here is a **summary of the key differences** between the two procedures:

#### 1. Evaluation Object

- **Module B**: Evaluates a **representative type** of the product (design and samples), i.e., a prototype or standard configuration for future production.
- **Module G**: Evaluates the **individual produced unit**, case by case, without reference to series production.

### 2. Purpose of the Procedure

- **Module B**: Aims to obtain a **type certificate** to authorize future production of units conforming to that type.
- **Module G**: A **final verification** of a specific unit to certify that **single unit's** compliance with applicable requirements.

#### ◆ 3. Involvement of UDICER as a Notified Body

- Module B: UDICER reviews technical documentation, samples, conducts or supervises tests on prototypes, and issues an EC type certificate.
- Module G: UDICER performs tests directly on the finished unit and issues a conformity certificate for that specific unit only.

#### ◆ 4. Use of the Certificate

- **Module B**: The certificate serves as a **basis for further modules** (e.g., D, E, or F) to certify production.
- Module G: Does not require additional modules: It is self-contained and valid for the verified unit.

#### ◆ 5. Manufacturer's Involvement

- **Module B**: The manufacturer **designs and submits a type**, with documentation and samples; future production is subject to additional controls.
- **Module G**: The manufacturer **produces the unit directly** and requests the NB to verify compliance **without intermediate steps**.

#### • 6. Typical Applicability

- **Module B**: Used for **series production** or standardized products.
- **Module G**: Suitable for **one-off items**, **custom products**, or **non-standard** cases where a repeatable type is not planned.



## ◆ 7. Documentation Retention

- For both modules, technical documentation and certificates must be retained for at least 10 years after the last conformity marking, but:
  - o **Module B**: Pertains to the **type**.
  - o Module G: Pertains to the single verified unit.

#### **CONCLUSION**

	Module B — EC Type Examination	Module G — Unit Verification
Object	Representative type (prototype)	Single product
Purpose	Certify the type	Certify the unit
Tests	On prototypes/samples	On the finished unit
Certificate	EC type certificate	Conformity certificate
Production	For series production	For one-off or custom items
Modularity	Basis for other modules (D, E, F)	Self-contained procedure

## **▼** WHEN TO CHOOSE MODULE B (EC TYPE EXAMINATION)

## **Typical Scenarios:**

- Series or repetitive production of standardized products.
- Products with stable and planned production cycles.
- The manufacturer aims to **obtain a type certificate** valid for all units produced to that standard.
- **Modularity is needed**: After Module B, D, E, or F can be applied for production or product control.

## **Advantages:**

- Cost-effective and advantageous for long-term multiple production runs.
- Once the type is certified, subsequent units do not require full testing.
- Flexibility in production management with ex-post controls.

#### Suitable Products:

• Lifejackets, inflatable liferafts, etc., produced in large volumes.



## WHEN TO CHOOSE MODULE G (UNIT VERIFICATION)

## **Typical Scenarios:**

- **Custom or one-off production** (unique items).
- When no **standard "type" exists** or certifying a type is not economically viable.
- For prototypes or complex products requiring immediate service approval.
- In **urgent cases** where time constraints prevent the full modular cycle (B+D/F).

## **Advantages:**

- Simple and direct: One unit, one verification, one certificate.
- No need for subsequent modules (D, E, F).
- Useful for development phases or custom orders.

#### Suitable Products:

- Rescue equipment installed on special vessels.
- Integrated systems for mega-yachts or research ships.
- Custom-made equipment.

## **✗** IN SUMMARY — GENERAL RECOMMENDATION

Production Type	Recommended Module	Reason
Series production	Module B + D/E/F	More efficient and modular
Custom/one-off production	Module G	More direct and specific
Prototype testing before series	Module G (initial)	Later transition to Module B if needed
Occasional/discontinuous production	Module G	Avoids unamortized Module B costs

# ARE THERE MAJOR DIFFERENCES IN TESTS BETWEEN THE TWO MODULES?

The tests required for Module B and Module G are essentially comparable in terms of type and severity, as both must demonstrate compliance with the same technical requirements of international standards (SOLAS, LSA Code, IMO standards, applicable test standards).

However, the context and objective of these tests differ.



## **Detailed Comparison**

Aspect	Module B	Module G
Test Objective	Verify that a <b>design type</b> complies.	Verify that the <b>single unit</b>
		complies.
Test Type	Type tests on representative samples.	Full tests on the built unit.
Applicable	Same reference standards (LSA Code, IMO,	Identical.
Standards	etc.).	
Test Execution	UDICER as Notified Body, directly or via	Identical.
	accredited labs.	
Sample	Can be a prototype or critical subset.	The finished product.
Test Frequency	Often once per type.	Once per unit.

#### **EXAMPLE COMPARISON OF TESTS FOR A LIFERAFT**

Test Type (Examples)	Module B — Type Test	Module G — Unit Verification
Inflation and Leak Test	Prototype inflation and air retention check.	Actual inflation of the produced liferaft.
Stability and Capsize Test	Conducted on a type sample in a test pool.	Repeated on the built unit (onsite or in a lab).
Material Resistance (fabric,	Tensile, aging, UV resistance	Same tests, but performed on
seams, valves)	tests.	the single unit.
Equipment Check (rations,	General assessment of	Physical verification of installed
lights, medicines)	planned equipment.	components.
Full-Load Buoyancy Test	Conducted on the type sample.	Conducted on the finished unit.
Automatic Release (HRU)	Functional check of the	Practical test on the system
Test	planned system.	installed on the unit.

Some tests required to demonstrate compliance (e.g., mechanical strength of fabrics, seams, critical components) are inherently destructive, but in Module G, a single finished unit is tested, often intended for direct service.

## **▼ PRACTICAL SOLUTIONS IN TECHNICAL-REGULATORY PRACTICE**

### 1. Partial Non-Functional Sampling

- Common practice to take **small samples** (e.g., a piece of fabric, a seam section, an extra valve) **without compromising functionality**.
- These samples undergo destructive testing in a lab.
- Sampling must be authorized by UDICER and documented



#### 2. Destructive Tests on Twin or "Identical" Samples

- The manufacturer can provide **separate samples** (unmounted) **from the same production batch**, ensuring they match those used on the unit.
- The NB accepts these if **traceable** to the unit's production batch.

#### 3. Use of Alternative (Non-Destructive) Tests Where Possible

- Some tests can be **simulated or replaced by NDT methods**, especially if validated on previous units.
- Often applied to valves, seams, or welded parts.

#### 4. Technical Documentation as Supplementary Support

- If the material or component was **previously tested** per the standard (e.g., in Module B or a prior production batch), those **results can be reused**, provided:
  - Material origin is traceable.
  - o The production process remains unchanged.

#### 5. Specific Contractual Agreements

• In rare cases, unit destruction is planned as part of testing, but only if pre-agreed with the manufacturer (used for prototypes).

## **\*** IN SUMMARY

Challenge	Module G Solutions
Destructive test on fabric or seams	Partial sampling or provision of twin samples.
Valve or functional part	Spare sample or declaration of identity with prior materials.
Risk of damaging the unique unit	Use of NDT or documented separate samples.
Repeated requirements from prior	Documented reuse of results if traceability and
certificates	homogeneity are proven.

#### TEST PLAN (EXAMPLE) — MODULE G — UNIT VERIFICATION

**Product: Inflatable Liferaft** 

★ Verification Object: Single produced unit

Summary Test Table



#	Test / Verification	Test Type	Execution Method	Notes
1	Technical Documentation Check	Documentary	Manual review of documents and labels.	Includes CE, MED checks, identification, and declaration.
2	Operational Inflation Test	Functional (non-destructive)	Direct test on the unit.	Verify automation and airtightness.
3	Air Retention Test	Non-destructive	Pressurization and leak monitoring.	Instrumental, with set time.
4	Capsize and Stability Test	Functional	In a pool or simulation.	Verify self-righting capability.
5	Equipment Verification (kit, rations, lights)	Visual/documentary	Inspection of liferaft contents.	Per LSA/IMO checklist.
6	HRU Test (Hydrostatic Release Unit)	Functional	Simulated activation or parallel test on an identical unit.	Avoid damage if possible.
7	Fabric (tensile strength, seams, coating)	Destructive (on sample)	Separate, labeled, and traceable sample.	Taken from the same supply batch.
8	Inflation and Overpressure Valves	Destructive (on spare)	Sample provided by the manufacturer, identical to the installed one.	Functional and resistance tests.

## TEST PLAN — MODULE G — RIGID/INFLATABLE RESCUE BOAT

- ₱ Product: RIB Rescue Boat (rigid hull + inflatable tube)
- **⊀** Verification Object: Single produced unit
- Summary Test Table

#	Test / Verification	Test Type	Execution Method	Notes
1	Technical Documentation and Identification Check	Documentary	Review of CE/MED markings, labels, declarations.	Verify consistency with Directive 2014/90/EU.
2	General Unit Inspection	Visual and functional	Complete inspection in yard/lab.	Check integrity, finishes, installed components.
3	Full-Load Buoyancy Test	Functional (non-destructive)	Water test with simulated load.	Must remain afloat in emergency conditions.
4	Stability and Self- Righting Test	Functional (non-destructive)	Test in calm water or pool.	Must self-right if capsized.
5	Navigation and Maneuverability Test	Functional (operational)	Water test with engine on, maneuvers.	Verify minimum



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				speed, acceleration,
				control.
6	Propulsion System	Functional	Start-up, acceleration,	Compare with
	Test		temperature/noise/vibration	manufacturer
	(outboard/inboard		checks.	specs.
	engine)			1
7	Quick	Functional and	Verify compatibility with	Simulated or
	Release/Launch	safety	release system (davits, HRU).	real test where
	System Test			possible.
8	Tube Inflation Test	Non-destructive	Inflation to nominal pressure	Monitor
	(if applicable)		+ airtightness check.	pressure for at
				least 30
				minutes.
9	Tube Material Test	Destructive on	Tests on twin samples (fabric	From the same
	(fabric, seams,	sample	and seams).	supply batch,
	valves)			traceable.
10	Onboard Equipment	Visual/documentary	Inspection per LSA Code	Verify
	Check (oars, rations,		checklist.	completeness
	lights)			and
				functionality.
11	Electrical/Lighting	Functional	Light activation, batteries,	Test under load
	Test		acoustic signals.	where possible.

#### A CLOSER LOOK AT TESTS

### SYNTHETIC TEST SCHEME FOR RESCUE BOATS UNDER DIRECTIVE 2014/90/EU

#### 1. General Requirements

- **Applicable Standards**: SOLAS Chapter III, LSA Code, ISO 15372 (for inflatable rescue boats), ISO 15540 (fire resistance), MED Module B/G (as applicable).
- **UDICER's Role**: Verify compliance through type-examination (Module B) or unit verification (Module G).

#### 2. Mandatory Tests for Rescue Boats

#### A. Documentation and Identification Checks

Test	Method	Criteria
CE/Marking	Visual inspection	Compliance with MED Annex II (markings, labels,
Verification		unique ID).
Technical File Review	Documentary	Design specs, materials, manufacturing process, prior
	check	certifications.



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#### B. Structural and Functional Tests

Test	Method	Criteria
Buoyancy &	Full-load flotation test	Must remain afloat and stable at max
Stability	(water)	capacity (SOLAS III/4.4).
Self-Righting Test	Capsize in calm water	Must self-right within 30 sec (ISO 15372 for
		inflatable boats).
Hull Integrity	Visual + pressure test	No leaks at 1.5x working pressure (ISO
	(inflatable tubes)	15372).
Propulsion System	Operational test (engine	Speed ≥ 6 knots, maneuverability per LSA
	run)	Code.
Quick Release	Simulated launch test	Must release within 5 sec under load
Mechanism		(SOLAS III/13.7).

#### C. Material and Component Tests

Test	Method	Criteria
Fabric Strength	Tensile test (destructive, on	Must meet ISO 15372 tensile strength (≥ 2,500
	sample)	N/5 cm strip).
Seam Strength	Peel test (destructive)	No separation under load (ISO 1421).
Fire Resistance	Flame application test (ISO 15540)	Must not sustain flames for > 20 sec after removal.
Valve	Pressure cycling test	Must maintain airtight seal after 1,000 cycles.
Functionality	Fressure cycling test	Wust maintain airught sear after 1,000 cycles.

#### D. Safety Equipment Checks

Test	Method	Criteria	
Lighting/Signaling	Operational test	Navigation lights, strobe ≥ 2 NM visibility (SOLAS	
		III/6.2).	
Onboard	Visual	Oars, bailer, first aid kit, etc. per LSA Code Annex 1.	
Equipment	inspection		

#### 3. Test Context

- **Module B (Type-Examination)**: Tests performed on prototypes/samples. Results apply to all units of the same type.
- **Module G (Unit Verification)**: Tests on each individual unit (e.g., inflation, propulsion, release mechanism). Destructive tests use spare samples.

#### 4. Key Normative References

- **SOLAS Chapter III** (International Convention for Safety of Life at Sea).
- **LSA Code** (Life-Saving Appliances Code).



- **ISO 15372**: Inflatable rescue boats.
- **Directive 2014/90/EU (MED)**: Modules B/G requirements.

**Note**: For rigid-hull rescue boats, additional tests may apply (e.g., impact resistance, watertight compartments).

#### Summary Table for Quick Reference

Category	gory Tests		Module G
Documentation	CE marking, technical file	V	
Buoyancy/Stability	Flotation, self-righting	$\checkmark$	$\checkmark$
Materials	Fabric, seams, fire resistance	V	(samples)
Propulsion	Speed, maneuverability	<b>V</b>	<b>✓</b>
Safety Systems	Quick release, lighting	V	V

#### The obstacle of destructive evidence

To avoid destructive tests (e.g., fabric strength, seams, valves) under **Module G**, the manufacturer may submit the following to **UDICER**, provided they demonstrate **traceability**, **prior compliance**, and **process consistency**:

#### 1. Material Compliance Certificates

- **Original test certificates** (e.g., ISO 1421 for fabrics, ISO 15372 for inflatable tubes) from accredited labs, confirming:
  - o Tensile strength (e.g.,  $\geq 2,500 \text{ N/5}$  cm for fabrics).
  - o Tear resistance, UV aging, waterproofing.
- Supplier's declaration of conformity referencing applicable standards (LSA Code, MED).

#### 2. Traceability Documentation

- Material datasheet with:
  - o Supplier name, batch number, production date.
  - o Technical specs (composition, weight, surface treatment).
- **Production records** linking materials to the unit (e.g., "Fabric Roll X used for Rescue Boat SN: RB-123").

#### 3. Prior Test Reports (Reuse of Results)

- Destructive test results from prior assessments, if:
  - o Performed on identical samples (same supplier, batch).
  - o Valid (typically within 2–5 years, per standard).

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- o Production process remains unchanged.
- Example: Reports from an approved **Module B** for the same material.

#### 4. Twin Unmounted Samples

- Spare samples (e.g., fabric swatches, uninstalled valves) from the same batch as the unit.
- Requirements:
  - o **Labeled and traceable** (linked to the unit's serial number).
  - Stored under manufacturer's control.

#### 5. Manufacturer's Declarations

- **Self-certification** attesting:
  - o Use of identical materials to those already certified.
  - No changes in production/construction processes.
- **UDICER agreement** to waive testing based on documentation (per MED Annex II).

#### 6. Approval of Non-Destructive Methods (NDT)

- Proposals for validated **NDT** (e.g., ultrasonic seam testing, visual inspection protocols).
- Requires prior UDICER approval.

#### **Practical Example**

For an **inflatable rescue boat**, avoid destructive fabric testing by submitting:

- 1. ISO 15372 certificate from the fabric supplier.
- 2. Tensile test reports from Module B.
- 3. Twin samples from the same fabric roll used for the tube.
- 4. Traceability declaration linking the roll to the unit's serial number.

#### Critical Note:

#### UDICER may reject documentation if:

- Traceability is unproven.
- Prior tests are outdated or from a different batch.
- Material specifications have changed (e.g., new supplier, formula revision).

### Regulatory References:

- Directive 2014/90/EU (Annex II Conformity Assessment Procedures).
- ISO 15372 (Inflatable rescue boats).
- LSA Code (Section 4.4 Rescue boats).

#### Key Takeaway:

Manufacturers can bypass destructive tests if they provide:

✓ Certified test history + ✓ Traceability + ✓ Identical materials.

Always consult **UDICER** for case-specific approvals.

#### ANNEX II

#### CONFORMITY ASSESSMENT PROCEDURES

#### MODULE B: EC TYPE-EXAMINATION

- 1. EC type-examination is the part of a conformity assessment procedure in which a notified body examines the technical design of marine equipment and verifies and attests that the technical design of the marine equipment meets the relevant requirements.
- 2. EC type-examination may be carried out in either of the following manners:
- examination of a specimen, representative of the production envisaged, of the complete product (production type);
- assessment of the adequacy of the technical design of the marine equipment through examination of the technical documentation and supporting evidence referred to in point 3, plus examination of specimens, representative of the production envisaged, of one or more critical parts of the product (combination of production type and design type).
- 3. The manufacturer shall lodge an application for EC type-examination with a single notified body of its choice.

The application shall include:

- the name and address of the manufacturer and, if the application is lodged by the authorised representative, its name and address as well;
- a written declaration that the same application has not been lodged with any other notified body;
- the technical documentation. The technical documentation shall make it possible to assess the conformity of the marine equipment with the applicable requirements of the international instruments as referred to in Article 4, and shall include an adequate analysis and assessment of the risk(s). The technical documentation shall specify the applicable requirements and shall cover, as far as relevant for the assessment, the design, manufacture and operation of the marine equipment. The technical documentation shall contain, wherever applicable, at least the following elements:
- (a) a general description of the marine equipment;
- (b) conceptual design and manufacturing drawings and schemes of components, sub-assemblies, circuits, etc.;
- (c) descriptions and explanations necessary for the understanding of those drawings and schemes and of the operation of the marine equipment;
- (d) a list of the requirements and testing standards which are applicable to the marine equipment concerned in accordance with this Directive, together with a description of the solutions adopted to meet those requirements;
- (e) results of design calculations made, examinations carried out, etc.; and

- (f) test reports;
- the specimens representative of the production envisaged. The notified body may request further specimens if needed for carrying out the test programme; EN 28.8.2014 Official Journal of the European Union L 257/171
- the supporting evidence for the adequacy of the technical design solution. This supporting evidence shall mention any documents that have been used. The supporting evidence shall include, where necessary, the results of tests carried out by the appropriate laboratory of the manufacturer, or by another testing laboratory on the manufacturer's behalf and under its responsibility.
- 4. The notified body shall:

For the marine equipment:

4.1. examine the technical documentation and supporting evidence to assess the adequacy of the technical design of the marine equipment;

For the specimen(s):

- 4.2. verify that the specimen(s) have been manufactured in conformity with the technical documentation, and identify the elements which have been designed in accordance with the applicable provisions of the relevant requirements and testing standards, as well as the elements which have been designed without applying the relevant provisions of those standards;
- 4.3. carry out appropriate examinations and tests, or have them carried out, in accordance with this Directive;
- 4.4. agree with the manufacturer on a location where the examinations and tests will be carried out.
- 5. The notified body shall draw up an evaluation report that records the activities undertaken in accordance with point 4 and their outcomes. Without prejudice to its obligations vis-à-vis the notifying authorities, the notified body shall release the content of that report, in full or in part, only with the agreement of the manufacturer.
- 6. Where the type meets the requirements of the specific international instruments that apply to the marine equipment concerned, the notified body shall issue an EC type-examination certificate to the manufacturer. The certificate shall contain the name and address of the manufacturer, the conclusions of the examination, the conditions (if any) for its validity and the necessary data for identification of the approved type. The certificate may have one or more annexes attached.

The certificate and its annexes shall contain all relevant information to allow the conformity of manufactured products with the examined type to be evaluated and to allow for in-service control.

Where the type does not satisfy the applicable requirements of the international instruments, the notified body shall refuse to issue an EC type-examination certificate and shall inform the applicant accordingly, giving detailed reasons for its refusal.

7. If the approved type no longer complies with the applicable requirements, the notified body shall determine whether further testing or a new conformity assessment procedure is necessary.

The manufacturer shall inform the notified body that holds the technical documentation relating to the EC type- examination certificate of all modifications to the approved type that may affect the

conformity of the marine equipment with the requirements of the relevant international instruments or the conditions for validity of the certificate. Such modifications shall require additional approval in the form of an addition to the original EC type- examination certificate.

8. Each notified body shall inform its notifying authorities concerning the EC type-examination certificates and/or any additions thereto which it has issued or withdrawn, and shall, periodically or upon request, make available to its notifying authorities the list of certificates and/or any additions thereto refused, suspended or otherwise restricted.EN L 257/172 Official Journal of the European Union 28.8.2014

Each notified body shall inform the other notified bodies concerning the EC type-examination certificates and/or any additions thereto which it has refused, withdrawn, suspended or otherwise restricted, and, upon request, concerning the certificates and/or additions thereto which it has issued.

The Commission, the Member States and the other notified bodies may, on request, obtain a copy of the EC type- examination certificates and/or additions thereto. On request, the Commission and the Member States may obtain a copy of the technical documentation and the results of the examinations carried out by the notified body. The notified body shall keep a copy of the EC type-examination certificate, its annexes and additions, as well as the technical file including the documentation submitted by the manufacturer, until the expiry of the validity of the certificate.

- 9. The manufacturer shall keep a copy of the EC type-examination certificate, its annexes and additions together with the technical documentation at the disposal of the national authorities for at least 10 years after the wheel mark has been affixed on the last product manufactured and in no case for a period shorter than the expected life of the marine equipment concerned.
- 10. The manufacturer's authorised representative may lodge the application referred to in point 3 and fulfil the obligations set out in points 7 and 9, provided that they are specified in the mandate.

#### MODULE G: CONFORMITY BASED ON UNIT VERIFICATION

1. Conformity based on unit verification is the conformity assessment procedure whereby the manufacturer fulfils the obligations laid down in points 2, 3 and 5 and ensures and declares on its sole responsibility that the product concerned, which has been subject to the provisions of point 4, is in conformity with the requirements of the international instruments that apply to it.

#### 2. Technical documentation

The manufacturer shall draw up the technical documentation and make it available to the notified body referred to in point 4. The documentation shall make it possible to assess the product's conformity with the relevant requirements, and shall include an adequate analysis and assessment of the risk(s). The technical documentation shall specify the applicable requirements and shall cover, as far as relevant for the assessment, the design, manufacture and operation of the product. The technical documentation shall, wherever applicable, contain at least the following elements:

— a general description of the product;

- conceptual design and manufacturing drawings and schemes of components, sub-assemblies, circuits, etc.;
- descriptions and explanations necessary for the understanding of those drawings and schemes and the operation of the product;
- a list of the requirements and testing standards which are applicable to the marine equipment concerned in accordance with this Directive, together with a description of the solutions adopted to meet those requirements;
- results of design calculations made, examinations carried out; and
- test reports.

The manufacturer shall keep the technical documentation at the disposal of the relevant national authorities for at least 10 years after the wheel mark has been affixed on the last product manufactured and in no case for a period shorter than the expected life of the marine equipment concerned.

#### 3. Manufacturing

The manufacturer shall take all measures necessary so that the manufacturing process and its monitoring ensure conformity of the manufactured product with the applicable requirements of the international instruments.

#### 4. Verification

A notified body chosen by the manufacturer shall carry out appropriate examinations and tests in accordance with this Directive, in order to check the conformity of the product with the applicable requirements of the international instruments. EN L 257/180 Official Journal of the European Union 28.8.2014

The notified body shall issue a certificate of conformity in respect of the examinations and tests carried out and shall affix its identification number to the approved product, or have it affixed under its responsibility.

The manufacturer shall keep the certificates of conformity at the disposal of the national authorities for at least 10 years after the wheel mark has been affixed on the last product manufactured and in no case for a period shorter than the expected life of the marine equipment concerned.

- 5. Conformity marking and declaration of conformity
- 5.1. The manufacturer shall affix the wheel mark referred to in Article 9 and, under the responsibility of the notified body referred to in point 4, the latter's identification number to each product that satisfies the applicable requirements of the international instruments.
- 5.2. The manufacturer shall draw up a written declaration of conformity and keep it at the disposal of the national authorities for at least 10 years after the wheel mark has been affixed on the last product manufactured and in no case for a period shorter than the expected life of the marine equipment concerned. The declaration of conformity shall identify the product for which it has been drawn up.

A copy of the declaration of conformity shall be made available to the relevant authorities upon request.

### 6. Authorised representative

The manufacturer's obligations set out in points 2 and 5 may be fulfilled by its authorised representative, on its behalf and under its responsibility, provided that they are specified in the mandate.