

1. Recreational Craft Directive

Evaluation of the Recreational Craft Directive

The European Commission DG-GROW has tasked the Centre for Strategy and Evaluation Services (CSES) and Emisia to perform the evaluation of the Recreational Craft Directive 2013/53/EU. It is anticipated the report will be available in late spring or summer 2026. The EBA has had an initial discussion with CSES. A [survey](#) is now being conducted, which will remain open until at least the end of October. Recipients of the survey have been encouraged to share it with their stakeholders to ensure a wide response.

Major Craft Conversion with the Recreational Craft Directive

The Recreational Craft Directive includes a requirement for any person placing on the market or putting into service a propulsion engine or a watercraft after a major modification or conversion thereof, or any person changing the intended purpose of a watercraft not covered by the Directive in a way that it falls under its scope, to apply the Post-Construction Assessment procedure before placing the product on the market or putting it into service. This reassessment of second-hand products before placing on the market or putting into service is unusual. Recreational watercraft are the only products in the EU we are aware of having such a process.

At the recent General Assembly meeting, European Boating Association members collectively expressed concern about emerging proposals which seek to more closely interpret the definition of what constitutes a Major Craft Conversion within the Directive. Market Surveillance Authorities and Notified Bodies have both been developing lists with examples of what changes to a recreational watercraft might or might not constitute a Major Craft Conversion.

Although these steps are intended to make recreational boating safer, they also bring unwelcome consequences which boat owners need to be aware of. If a boat owner makes changes to their boat which constitute a Major Craft Conversion, to be re-certified under the Directive the watercraft must undergo a Post-Construction Assessment process. According to Annex V of the Directive, the boat owner then becomes responsible for the entire vessel (in the same way as the manufacturer is responsible for the conformity of a new boat).

EBA members believe that is an unreasonable responsibility to place on a boat owner, unless (in accordance with the interpretation provided by the Blue Guide on the implementation of the product rules and the RCD Application Guide) the changes are sufficiently significant that the boat needs to be treated as a new craft. Post-Construction Assessment must therefore be limited to genuine situations where a watercraft has been altered to the extent it is in essence a new watercraft.

EBA members strongly oppose any move to classify modifications as a Major Craft Conversion that are not clearly within the current agreed interpretation of the Directive as published in the Blue Guide and the RCD Application Guide.

Omnibus Directive Aligning product legislation with the digital age

The EBA has provided feedback on the Annex to the Omnibus Directive which will amend Annex V of the RCD. As currently drafted, this requires a person who is applying for a Post-Construction Assessment (in accordance with the RCD) to provide the notified body conducting the assessment with the document and technical file in electronic format. For many older boats the document will only be available in paper format. The EBA has proposed that this should be amended to allow the documents to be presented in the format they were issued in, which for newer boats may in future become an electronic format.

2. International Certificate for Operators of Pleasure Craft (ICC)

The EBA reconfirmed its position on the ICC (<https://eba.eu.com/about/position-statements/>)

The EBA was represented at the closing workshop for the study, commissioned by the European Commission to determine the advantages and drawbacks of a possible mutual recognition of boating licenses for recreational boat operators. Those present favoured an approach based on the EU encouraging Member States to accept the ICC, rather than creating a new EU boating license. The report from the study, which will make recommendations to the European Commission, was expected in the summer of 2025 but has not yet been published.

3. Cruising Boat Tourism

The EBA has combined its positions on inland tourism and coastal and maritime tourism into a single document which seeks to reduce the regulatory burden on cruising boats when crossing borders from one country to another.

The EBA responded to a European Commission call for evidence relating to the EU Sustainable Tourism Strategy. This new strategy is intended to create a more sustainable and competitive EU tourism sector, taking account of climate change, development imbalances, geopolitical tensions and structural fragmentation in the sector.

4. End-of-life Boats

The EBA has reconfirmed its position on end-of-life boats (<https://eba.eu.com/about/position-statements/>).

Life cycle impacts and end-of-life boats

A webinar was held in March 2025 to present the initial findings of the European Boating Industry life cycle impacts project. The project objective is to assess impacts across the whole life of the boat and to make design improvements as a result. Key challenges from the user perspective were how use patterns were determined, including the definition of the “functional unit” and the boat categories to be assessed, and assumptions such as those surrounding fuel usage.

Best practice environmental guidance for the prevention, reporting, and processing of end-of-life recreational marine vessels

Consultancy Resource Futures has been commissioned by the Swedish Maritime and Water Management Authority, on behalf of the OSPAR Commission, to develop best practice environmental guidance for the prevention, reporting, and processing of end-of-life recreational marine vessels.

The information gathered will help develop a best environmental practice guidance document which aims to:

- Help reduce abandonment of recreational vessels and associated leakage of plastic into the marine environment
- Support consistent and transparent reporting and tracking across OSPAR countries
- Promote safe, resource-efficient dismantling and material recovery that advances circular economy objectives.

5. Alternative fuels

Hydrotreated Vegetable Oil (HVO) is a key part of decarbonisation plans for our sector for those with diesel engines

The EBI life cycle impacts project is nearing completion.

6. Underwater Noise

HELCOM is trying to gain a better understanding of boat movements, and has been looking at options for tracking of leisure vessels, including AIS. A clear move away from considering only impulsive (i.e. construction) noise and towards continuous noise has been noted. A further shift is towards considering leisure vessels as well as shipping, due to the ability of smaller vessels to access protected sites. The impact of electrification remains unclear. Low frequencies are reduced but not high frequencies. Other work at HELCOM includes trying to standardise recording methodologies, with on-going discussion of calibration protocols.

7. EU VAT and customs status for recreational boats

The EBA continues to work closely with the European Boating Industry (EBI) to seek solutions for the problems recreational boaters face when needing to demonstrate the customs status for a recreational boat, in particular that VAT has been correctly accounted for. Work with the European Commission has not yet produced a solution. The European Commission seems to understand the problems recreational boat owners face if they need to demonstrate that their boat is in free circulation in the EU or that it is eligible to enter the EU as returned goods (i.e. without VAT being payable). However, while discussions with Member States have resulted in a draft guidance document. This document, although informative, does not yet provide a satisfactory solution to this long-standing issue.

8. Inland Waterways

The EBA continues to represent the interests of recreational boaters both at the United Nations Economic Commission for Europe Working Party on Inland Water Transport (and its sub group) and at the European Committee for drawing up standards in the field of inland navigation (CESNI)

We continue to seek clarification from the European Commission in relation to the application of Regulation 2016/1628 (NRMM) for recreational craft falling within ES-TRIN Chapter 26.

The longstanding concerns expressed by the EBA to the European Commission regarding the 100 cubic metre rule in Directive (EU) 2016/1629 remain unaddressed. We continue to seek a resolution to the unequal way the Directive is applied because of the way 100 cubic metres is calculated in the Directive.

8. EBA General Assembly dates for 2026

The EBA holds two General Assembly meetings a year, bringing members together, in person, to complete the association's routine business and discuss issues of concern. In 2026 EBA members will meet on 17-18 April and 2-3 October.

Note:

Agreed EBA position statements can be found on the EBA website at <https://eba.eu.com/about/position-statements/>. However, the latest EBA General Assembly meeting was held on 10 & 11 October. At the time of writing new and updated position statements had not been uploaded.

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