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Key words:

Module C2 Product Checks - Test Cycle for PFD's

Question:

When a manufacturer chooses Module C2 certification as part of the route to conformity for PFD's, what testing is to be conducted as part of the annual product checks in accordance with Annex VII, clause 4?

Solution:

The attached testing schedule shall be used (Table 1 for inherently buoyant PFD's or Table 2 for inflatable PFD's) which covers all the fundamental elements of testing for PFD's.

Testing shall be carried out in accordance with the relevant parts of ISO 12402/12401 as applicable to the PFD type and performance level.

Table 1 - Inherently Buoyant PFD's Test Cycle

| Description of Tests | Module C2 Cycle | | | | |
|---|-----------------|--------|--------|--------|--------|
| | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
| 5.5.3 Temperature cycling test | | X | | | |
| 5.5.2 Rotating shock bin test | | X | | | |
| 5.5.4 Horizontal load test | X | | | | |
| 5.5.4 Vertical load test | X | | | | |
| 5.5.5 Lifting loop test | X | | | | |
| 5.5.6 Buddy line test | X | | | | |
| 5.5.7 Collar handles | X | | | | |
| 5.5.8 Body strap hardware secureness test | X | | | | |
| 5.5.10 Measurement of buoyancy of the whole device | | X | | | |
| 5.5.12 Buoyancy test for inherently buoyant material | | X | | | |
| 5.5.13 Test of the resistance to burning | | | | X | |
| 5.5.15 Strength test of attachment points (including whistle) | X | | | | |
| 5.6 In water performance testing ^a | | | X | | |
| 6 Marking | X | X | X | X | X |
| 7 User Instructions | X | X | X | X | X |
| Integral Harness: Dynamic harness test (ISO 12401, 5.2.5) | X | | X | | |
| Application for certificate renewal at least 6 months before the expiry date of the certificate (see Note below). | | | | | X |

a In water performance tests to be conducted on at least three test subjects covering the smallest, middle and largest sizes suitable for the device.

Note: The tests performed in Year 5 shall be determined by the Notified Body as part of the certificate renewal process. If the standards have been revised and published in the Official Journal, the notified body will review the changes against the existing data, and any requirements not satisfactorily addressed will be covered by additional product testing and used in support of certificate renewal.

Table 2 - Inflatable PFD's Test Cycle

| Description of Tests | Module C2 Cycle | | | | |
|---|-----------------|--------|--------|--------|--------|
| | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
| 5.5.3 Temperature cycling test | | X | | | |
| 5.5.2 Rotating shock bin test | | X | | | |
| 5.5.4 Horizontal load test | X | | | | |
| 5.5.4 Vertical load test | X | | | | |
| 5.5.5 Lifting loop test | X | | | | |
| 5.5.6 Buddy line test | X | | | | |
| 5.5.7 Collar handles | X | | | | |
| 5.5.8 Body strap hardware secureness test | X | | | | |
| 5.5.14 Over-pressure test | | X | | | |
| 5.5.11 Uninflated buoyancy test | | X | | | |
| 5.5.10 Measurement of buoyancy of the whole device | | X | | | |
| 5.5.9 Inflation tests | | X | | | |
| 5.5.16 Test of the resistance to inadvertent inflation | | X | | | |
| 5.5.13 Test of the resistance to burning | | | | X | |
| 5.5.15 Strength test of attachment points (including whistle) | X | | | | |
| 5.6 In water performance testing ^a | | | X | | |
| 6 Marking | X | X | X | X | X |
| 7 User Instructions | X | X | X | X | X |
| Integral Harness: Dynamic harness test (ISO 12401, 5.2.5) | X | | X | | |
| Application for certificate renewal at least 6 months before the expiry date of the certificate (see Note below). | | | | | X |

a In water performance tests to be conducted on at least three test subjects covering the smallest, middle and largest sizes suitable for the device.

Note: The tests performed in Year 5 shall be determined by the Notified Body as part of the certificate renewal process. If the standards have been revised and published in the Official Journal, the notified body will review the changes against the existing data, and any requirements not satisfactorily addressed will be covered by additional product testing and used in support of certificate renewal.