

Joint Meeting of the Inspection Bodies



PRESENTATION OF THE RESULTS OF THE SMALL WORKING GROUPS

Vienna, 24-26 April 2018



Disclaimer

This presentation is for documentary purposes only.

Final answers to the questions and the conclusions will be developed and published accordingly by CESNI competent bodies.



HR1 - Hull inspection

The following items should be checked during hull inspection:

- Hull in general (inside and outside, all structure elements)
- Propeller shaft, propeller shaft bearing, rudder stock bearing, riverchest valves
- Other items as deemed necessary by the inspector

Harmonised procedure and reporting form concerning above mentioned items for the inspection bodies are called for

HR2 - Ultrasonic thickness measurement

Persons in charge of ultrasonic thickness measurement (UTM) shall be experts according to ESI-I-2 and have special knowledge about inland navigation vessels

Should limitations from strengths calculation including loading conditions be noted in the inland navigation vessel certificate?

YES, under item 52

- Dry docking not only for thickness measurement but also to check for damages as well as on state of e.g. cooler inlets, rudder, propeller, weld seams
- Proof of dry docking within one year before the periodical inspection may be accepted instead of dry docking during the periodical inspection
- Dry docking is anyway mandatory for vessels under full class

- Der Antwortvorschlag ist soweit in Ordnung.
- Das Steuerhaus, Notstromversorgung sollte zu den Beispielen zugeführt werden.
- Gemäß Artikel 3.03 Nummer 2 Absatz 2 sind Ankereinrichtungen und Rudermaschinen ausgenommen.
- Folglich verweist die Frage FR3 auf den gleichen Sachverhalt.

Hull – equipment in front of collision bulkhead

- See also ES-TRIN-faq on Article 3.03(2) with regard to radar equipment
- Proposed answer in general ok
- In the list of accepted equipment add
 - Bow rudder, ***but not bow thruster***
 - [...]
 - ***Radar***

- Article 7.03 does not require certain monitoring equipment, but only gives requirements for monitoring equipment if installed
- Requirement to install monitoring equipment comes from other provisions, like e.g. Art. 7.04 (main engines and steering system), Article 7.05 (navigation lights)
- General requirements for electrical power supply are laid down in Article 10.02
- The list of items given in the proposed answer could be discussed in the light of Article 10.02

(Article 7.06(3), Annex 5 Section IV)

- The approved specialist firm that has installed the equipment (radar, rate-of-turn indicator, Inland AIS) may also do the installation check and operating test
- A separation of the two tasks is not necessary
- ESI-I-2 provides an overview of different regulations for acceptance tests, additional separations of tasks are not necessary

Article 7.12(3) second sentence

- Transitional provision only for vessels before 1985 outside of Rhine
- For all other vessels it shall be possible to enter and leave the wheelhouse safely, whatever its position
- This has to be evaluated (see Article 7.12(12)) for each vessel
- A roof hatch is not sufficient, it has to be possible to reach the deck safely

- According to Article 7.12(12) proof of adequate strength and stability of elevating wheelhouses shall be provided by calculations
- What are the criteria for “adequate strength and stability”?

Article 8.05(9)

- Group V agrees with the proposed answer (Each fuel tank is to be fitted with a suitable capacity-gauging device providing reliable information right up to the maximum filling level. Glass gauges are not prescribed but where they do exist they must comply with the requirements of Article 8.05(9).)
- The same answer applies to hydraulic and lubrication oil tanks

This topic is a matter of ADN regulations. Moreover the working group II believes that it is the responsibility of the skipper to make sure that no dangerous goods can be pumped overboard unintentionally

The use of high-performance ballast pumps may impose a risk on the stability of the vessel.

When these pumps are installed, due consideration should be given to the stability of the vessel through calculations. It might be worth considering to provide stability calculation instructions.

The topic should be analyzed by CESNI/PT.

If the anchor's weight is below the calculated value, the anchor has to be replaced.

Maximum permissible reduction of the mean diameter of chain: 12% (German experts have scrutiny reservation; answer to be checked against requirements of DIN standard)

The installation as a whole must meet the relevant criteria of the relevant IMO resolution. The type approval is only about the nozzles.

The system or installation should be checked during the inspection and the Article 13.04(5) should be amended accordingly.

Discussion on this matter led to the conclusion that for some objects it may be desirable to allow permanently firefighting systems. A list of possible objects needs to be made and it could be considered if Article 13.05 can be applied accordingly.

- Today, firefighting systems for protecting objects are only allowed on the basis of a recommendation (RVIR 2.19 or EU Directive)
- Experts are of the opinion that such firefighting systems are desirable on board for the following situations:
 - deck equipment (enclosed engines, cranes, ...)
 - electrical service rooms, switchboard or batteries rooms
 - paint lockers
 - apparatus on floating equipment
 - similar enclosed spaces (cabinet, chest, cupboard...)
- Minimum requirements for firefighting systems for protecting objects = Article 13.05, subject to adaptations for electrical fires
- Wish that CESNI/PT includes this item in its work programme

For floating equipment, a working boat can be considered as a ship's boat.

English version of ES-TRIN Article 13.07(2) shall be amended to be in line with other language versions (“shall carry” to be replaced by “shall be equipped with”)

Article 14.07

- According to EN 13056 two handrails are only necessary if the stair has more than 3 steps and a width of more than 900 mm
- The application of the EN is not mandatory, but it represents the state-of-the-art (and it is mentioned in Chapter 19)

Group I would like to ask CESNI/PT for general clarification of Article 14.09(1).

In general, there seem to be no health issues arising from vibrations of inland navigation vessels.

In general, inspection bodies are not responsible for enforcement of requirements of Directive 2002/44/EC.

HR7: The working group agreed that Article 14.12 should not be applied to davits that are exclusively used for lowering ships boats. These davits should be clearly defined in the regulations.

The ES-TRIN is clear about the time in which ship's boats must be lowered, so further regulations on davits must be discussed in CESNI/PT.

HR8: The provisions are provided in ES-TRIN 2019.

- Redaktionelle Anpassung „Mindestgeschwindigkeit“
- Dem Antwortvorschlag kann die Arbeitsgruppe IV nicht folgen.
- Die Arbeitsgruppe sieht keinen Lösungsvorschlag:
Denn die Auslegung Artikel 5.04 widerspricht der Praxis.
- Wenn die Mindestgeschwindigkeit bei 70 % nicht eingehalten wird, schlägt die Arbeitsgruppe vor die max. Ladekapazität des Fahrzeugs anzupassen.
- Grundsätzlich stellt sich die Frage, ob die mind. 70 % Ladezustand für Probefahrten richtig ist. Eine Überarbeitung dieses Sachverhalts wird von der Arbeitsgruppe empfohlen.

- Seems to be a mainly legal problem
- Remark on first page of model of certificate: „The craft may be used for navigation by virtue of this inland navigation vessel certificate only while in condition herein described.“
- „normal operation“ only possible if vessel still fulfils all statutory requirements (e.g. minimum speed, manoeuvrability, if applicable second independent propulsion) and the alternative configuration is entered on the certificate (Nr. 52)
- If no entry on special conditions under which the above requirements can also be fulfilled alternatively to the standard configuration → „emergency operation“ only to the next berth/ place for repair
- Capability of „steerageway under its own power“ alone does not constitute „normal operation“

- Small working group is strongly in favour of generally avoiding doubler plates
- Installation of doubler plates only in line with ESI-II-2
- Perhaps official communication from CESNI to all inspection bodies could be helpful to raise awareness

- Die Arbeitsgruppe kann die Problemdarstellung nachvollziehen, sieht jedoch keine Notwendigkeit an dieser Norm etwas zu ändern, da kein deutliches Anzeichen einer Änderung im Raum steht.
- Zumal wurde im ADN untersucht, ob die Öffnung eines von mind. 0,36 m² großen Öffnung mit persönlichen Schutzausrüstung groß genug ist.
- Aktuell sieht die Arbeitsgruppe keinen Grund zu handeln.
- Aufgrund der verschiedenen Arten von Notausgängen können keine Standards für Öffnungsrichtung oder Schließvorrichtungen vorgegeben werden.
- Es liegt jedoch im Ermessen der Untersuchungskommissionen sinnvolle Auflagen für das sichere benutzen eines Notausgangs zu fordern.
- Fazit: Der Antwortvorschlag bezieht sich nicht auf alle Schiffe. (z.B. Öffnungsrichtung ist nur bei FGS vorgeschrieben). Eine Regelung für den Zugang für Rettungskräfte sieht die Arbeitsgruppe kritisch, da ein Einsatz nicht vorausgeplant werden kann.

- Difference between language versions is confirmed
- However, Article 13.01(2) specifically refers to passenger vessels ***and vessels not intended for the carriage of goods***, which would also address tugboats
- Editorial correction: delete “ainsi que les remorqueurs” from Article 13.01(1) of FR version of ES-TRIN

- Referenz Artikel 19.15 Nummer 9 ist mit Nummer 8 zu korrigieren.
- Mobile Gasgeräte sind verboten. Festeingebaute Gasgrills für FGS < 45 Meter sind erlaubt.
- Der Antwortvorschlag ist wie folgt in grün zu ergänzen: „Die Verwendung eines **festeingebauten** Gasgrills ist zwar zulässig...“

- Proposed answer is correct from technical point of view
- See also RV/G (12)m 59 / JWG (12)m 61, remarks on Chapter 24
- Apparently a significant number of vessels has been built with gas-tight(?) doors in the engine-room bulkhead directly bordering on passenger or crew areas in the recent past
- Hard application of the requirement might meet considerable opposition
- However, there are also newbuildings in full conformity with this requirement → level playing field?
- Perhaps further clarification of respective Articles (3.03, 19.06) might be considered by CESNI/PT

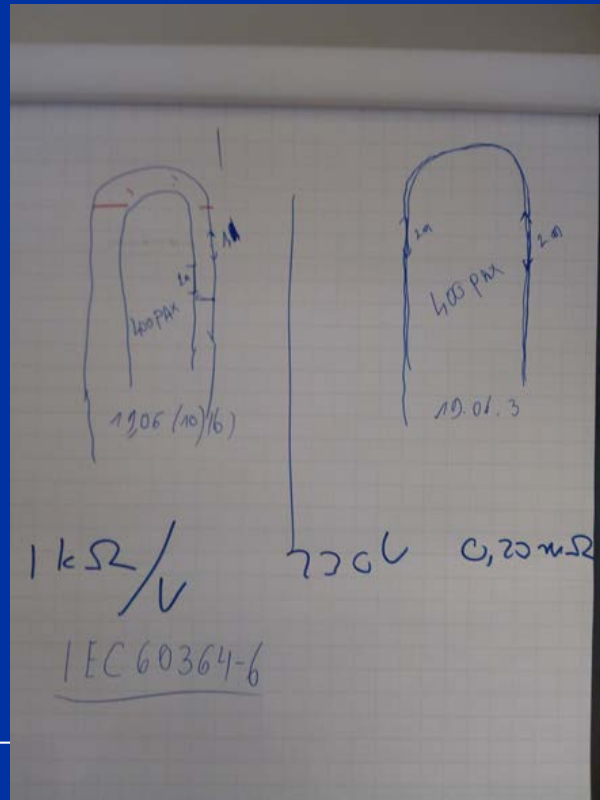
It should be clarified by the working group CESNI/PT/PAX which types of live saving appliances are meant in the different articles.

The regulations that apply for sea going vessels should be taken into consideration, in order to see if similar arrangements can be made in inland navigation.

Due consideration must be given to the information that is given to crew and passengers before embarking on a journey.

It should also be addressed to CESNI/QP.

Group II: This article led to a very lengthy debate in the working group. The rules seem to be clear on how wide the different types of exits must be, but the strict application of the rules may sometimes lead to situations that can be considered unsafe. The conclusions will be forwarded to the working group CESNI/PT/PAX with the recommendation to further analyze this topic.



DE4

- ESI-III-2 Berücksichtigung der besonderen Sicherheitsbedürfnisse von Personen mit eingeschränkter Mobilität orientiert sich an der Richtlinie 2009/45/EG für FGS in der nationalen Fahrt auf See.
- Dem Leitfaden für die behindertengerechten Ausstattung von Binnenfahrgastschiffen gemäß der Resolution Nr. 69 der Vereinten Nationen.
<https://www.unece.org/fileadmin/DAM/trans/doc/finaldocs/sc3/ECE-TRANS-SC3-188e.pdf>
- ES-TRIN Artikel 19.06 Nummer 17: „Mindestens eine Toilette muss entsprechend einer einschlägigen Norm oder Vorschrift eines Mitgliedstaates für die Nutzung durch Personen....“
- Fazit: die Interpretation ist offen gemäß den o.g. Richtlinien. Es wird von der Arbeitsgruppe empfohlen keine festgelegten Abmessungen als Norm vorzuschreiben.

FR6 - Die Arbeitsgruppe ist der Meinung, dass es keine Ausnahme gemäß Antwortvorschlag gibt.

HR4: The working group II believes it should continue to apply only to passenger vessels. In individual cases the inspection bodies / experts can always demand a measurement.

HR5: The working group II recommends the international standard IEC 60364-6 or the rules of recognised classifications societies.

The working group II proposes to CESNI/PT to provide an administrative instruction related to the measurement methodology (mega-test).

19.11(1)(b), (c), (d)

- If a certificate mentioned in Article 19.11 has been issued according to equivalent regulations of another member state, the owner has to provide a confirmation of the vessel certification authority of that country
- EN ISO 1182 can be deemed as equivalent to Article 19.11(1)(b)
- We would need a list from CESNI with all equivalent regulations to reduce the administrative burden

DE5 | Platform, accessible from each side of the vessel,
directly above the line of flotation

GROUP V

19.15(4) and (5)

- Group V agrees with the proposed answer
- Rescuing systems that fulfil these requirements (e.g. Jason's cradle) can be accepted as comparable installations if properly installed



Yes. The interpretation is correct.

It's not necessary to keep the proposed clarification,

BE3/BE4 | Applicability of transitional provisions to craft which are already in service (+ Art. 33.01)

GROUP I

The discussion focused on the question, whether a vessel can make use of transitional provisions once a certificate has been expired (not having been valid continuously).

Key items of the discussion:

- Group members of Germany did not agree with understanding that once a certificate has been expired (not having been valid continuously), the vessel cannot make use of transitional provisions
- Need of further discussions inside delegations
- Need of further examination, including possible differences in various linguistic versions of regulatory documents
- Reminder of the explanation given by EC in 2012 + confirmed by JWG in 2014 - JWG (14)m 91, item 7.1
- Responsibility of MS to implement EU law, including appropriate resources to ensure timely vessel inspections

- Fragestellung ist nicht ganz klar.
- Es gab vor 1995 bereits schon Regularien. Dienstanweisung 42 wurde ersetzt durch Empfehlung 27 der RheinSchUO.

- Es gibt zwei unterschiedliche Regularien einerseits für das Rheinattest (Artikel 32.01), andererseits für das Gemeinschaftszeugnis (Artikel 32.05).
- Bei einer Unterbrechung der Laufzeit des Rheinattestes darf man nicht mehr die Übergangsbestimmungen nach Artikel 32.01 bis 32.04 in Anspruch nehmen. Folglich ist das Fahrzeug wie ein neues Fahrzeug zu untersuchen.
- Bei einer Unterbrechung der Laufzeit des Gemeinschaftszeugnis darf man alle Übergangsbestimmungen nach Kapitel 33 in Anspruch nehmen. Folglich ist keine Neubauuntersuchung verlangt.
- Fazit: Eine Harmonisierung gemäß CESNI wird durch die Arbeitsgruppe nicht festgestellt. Was war der Grund dieser unterschiedlichen Auslegung?

Article 29 of Directive 2016/1629

Group V:

- If the technical inspection according to Article 29 of the directive has not been carried out before 30 December 2018 the transitional provisions of Article 29 can not be used
- The transitional provisions of chapter 32 of ES-TRIN can be used
- It is not necessary that the certificate is issued before 30 December 2018, but a technical inspection has to be carried out
- **Diese Lösung ist für die Arbeitsgruppe V abschliessend.**

Group I: Option 1 applies

- Agreement with the answer

However, if two inspection bodies agree, the issuance/renewal of certificate can be transferred from one to the other. Communication between administrations to transfer the inspection files is necessary

- Proof of ongoing inspection can be given in two ways:

- by statement / stamp in the certificate or
- by temporary withdrawal of certificate and replacing it by provisional certificate

- Call for an amendment of European hull database (EHDB), which allows indication of ongoing inspection / renewal of certificate

2006/87/EG Anhang II
(EU) 2016/1629 Anhang V

Dem Antwortvorschlag wird gefolgt.

BE5, CH3, DE8 | Issuance of the inland navigation vessel certificate

GROUP I
GROUP IV
GROUP V

Group I – The group recognises the problem and agrees with proposal of DE8/BE5.

Solution (for problem related to software) could be found when a new model of certificate is developed according to CESNI work programme

Gruppe IV

- Diesbezüglich verweist die Dienstanweisung Nr. 11 (RheinSchUO) / ESI-I-1 (ES-TRIN) auf die Ausstellung des Binnenschiffszeugnisses hin.
- Für die Verlängerung des Binnenschiffzeugnis sind die Seiten 9/10, Ziffer 49 vorgesehen.
- Die Seite 2 bleibt grundsätzlich (Zonenänderungen) bestehen und ist nicht für Verlängerungen vorgesehen.

Gruppe V: ESI-I-1

- Die niederländische Delegation begründet das Vorgehen mit ihrer aktuellen Software / ihrem aktuellen Programm.
- Wenn das nicht mit dem Programm machbar ist, sind die Einträge gemäss Dienstanweisung von Hand einzutragen und zu stempeln.
- Den Antwortvorschlägen wird gefolgt.

- Der formal-juristische Hintergrund ist der Arbeitsgruppe nicht klar.
- Ist zu klären.

- Article 29 (2) of Dir. (EU) 2016/1629 (formerly Article 8(2) of Directive 2006/87/EC) clearly states that „any failure to meet the technical requirements [...] shall be specified in the Union Certificate“
- In case of deficiencies found in an inspection in accordance with Article 22 (Control of compliance) the respective procedures apply (e.g. statement of shortcomings communicated to issuing authority)
- A Union certificate can only be withdrawn by the competent authority that issued it (or made the latest renewal of validity) (Article 15)

- Group II recommends the certificate page 13 should be in national language an in English and it's necessary to amend ESI-I-1.

New – pump room – alarm installation

- Question: What is a pump room? In which cases an alarm installation in accordance with Art. 7.09(1) is necessary?
- Example: small compartment with only one small hydrophor
- Proposed answer of group III:
There is a definition of „pump room“ in the ADN, it should be considered to add a definition also to ES-TRIN, based on the definition in the ADN (and, e.g., adding ballast pumps, firefighting pumps).
Considering the general purpose of the alarm system the size of the compartment might be taken into account; if the compartment is so small, that it is not probable that persons would need to enter the room frequently or spend a longer term of time in the room (e.g. for operation, maintenance etc. of the pumps in question) it should not be regarded as a pump room requiring an alarm system

New – pressure vessels – recognised experts

- Question: Who can be recognised as an expert for pressure vessels, who decides on the recognition?
- Reference: Article 8.01(2); ESI-I-2 – Experts and competent persons
- Proposed answer of group III:
Recognition of experts has to be in line with ESI-I-2. The relationship between Article 8.01(2) and general EU legislation on pressure equipment seems to be a bit unclear, a clarification might be considered by CESNI/PT. Dir. 2014/68/EU explicitly excludes ships from the scope, so the general requirements on construction, maintenance etc. seem to be undefined for inland navigation vessels.

New – extension without inspection – pressure vessels

- Question: In case a vessel benefits from the exceptional extension of the validity of the Union Certificate (Art. 11 of Dir. (EU) 2016/1629) does this also apply to pressure vessels?
- Proposed answer of group III:
The exceptional extension that can be granted under the regime of Article 11 of the Directive only applies to the date of expiry of the certificate. It does not lift any obligations concerning the periodical inspection of special equipment like pressure vessels, portable fire extinguishers etc.

New – major repair

- Question: What shall be considered a major repair within the meaning of Art. 14 of Dir. (EU) 2016/1629?
- Text of Directive: [...] major repairs which affect the craft's compliance with the technical requirements referred to in Annexes II and V concerning its structural soundness, navigation, manoeuvrability or special features, [...]

- Agreement with the proposal, except for item 9 for which there are different options on how to enter owner/operator in the certificate. Further discussion is necessary in CESNI.





THANK YOU FOR YOUR ATTENTION