

CESNI/PT (18) 101 5 November 2018 Or. fr fr/de/nl/en

WORKING GROUP TECHNICAL REQUIREMENTS

Accommodation aboard inland navigation vessels

Communication by the ETF

Dear Mr. Boyer,

The ETF noted with interest the holding of a workshop on accommodation, on 19 November 2019, under the auspices of the CESNI/PT Working Group. Unfortunately it will be unable to send a representative owing to other commitments.

ETF hereby wishes to recall certain comments made in 2010 in the Inspection Regulations Working Group (see RV/G (10) 59 = JWG (10) 53) and welcomes the analysis submitted by the German delegation with document CESNI/PT (18) 78.

The drawing up of standards for accommodation assumes particular importance for all those who will be required to occupy such accommodation. We invite the CESNI to take a lead from the maritime sphere, in particular the International Labour Organisation (ILO) and Maritime Labour Convention (MLC), 2006), which incorporates conventions such as 68 (1946), 78 (1946), 92 (1949), 133 (1970), 140 (1970) and 141 (1970) on seamen's accommodation, bedding, noise prevention, ventilation, etc. These standards have been drawn up within a tripartite system. Better account must be taken of the legitimate interests of the two sides of industry when drawing up future European standards.

ETF would also like to highlight work currently in hand to develop a sustainable crew management tool, namely the TASCS study (Towards a Sustainable Crewing System). This being so, one of the fundamental challenges is to maintain the attractiveness of the inland navigation sector for employees.

In the context of the workshop on 19 November, ETF would like to draw attention to the following points:

- Ensuring privacy aboard, inter alia to take account of mixed crews (men / women). For new vessels, each crew member should have an individual room, toilet and bathroom.
- Ensuring the quality, dimensions and number of cabins and living quarters in the river cruise sector (large numbers of crew members, long voyages).
- Taking into account new needs in terms of free Internet access aboard, both for leisure purposes and for staying in touch with crew members' home ashore.
- Providing access to daylight (by means of a window on the vessel's side and not an overhead skylight) and providing accommodation with air conditioning.
- Taking account of the fact that there may always be workers aboard. No distinction between an owner-operator vessel and a shipping company vessel. The quality of the accommodation has a direct impact on crew fatigue and concentration and therefore on safe navigation.

• Setting measurable and clearly defined limits for health-related factors such as heat, noise, vibration and emissions.

We hope that you will find these comments helpful and we are prepared to participate in future work.

Yours sincerely ...

European Transport Worker's Federation Inland navigation section

Joris Kerkhofs President