

# FAQ

FREQUENTLY ASKED  
QUESTIONS

## COLLECTION OF FAQs ON THE ADMINISTRATION OF CERTIFICATES

December 2025



European Committee for drawing up  
Standards in the field of Inland Navigation

# Collection of FAQs on the administration of certificates

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## Disclaimer

This FAQ document (hereinafter 'FAQ') contains the interpretation of the European Committee for drawing up Standards in the field of Inland Navigation (CESNI) of ES-QIN standards and the outcome of CESNI exchange on good practices on the administration of certificates. The document also includes the questions and answers that have been discussed within the European Commission Experts Group on social issues in inland navigation or that have been subject of a bilateral written exchange and forwarded to the members of the group.

This FAQ reflects the views of CESNI or of the services of the European Commission and are without prejudice to the interpretation by the Court of Justice of the European Unions (CJEU) or any other competent court.

CESNI's interpretation is a clarification and not a modification of the standards.

This FAQ shall be intended as a living document; its content could be modified or updated by CESNI, based on updates of the legislation, and according to CESNI's understanding on the matter as experience is gained.

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# 1 Section I: Compilation of questions and answers from CESNI/QP

## 1.1 2D barcode in certificates of qualification

What type of 2D barcode should be used to link to the European Crew Database in certificates of qualification?

(see document CESNI/QP (20) 92 rev. 1)

A QR-code containing a link to the European Crew database and the CID of the holder should be used on the certificate of qualification for boatmasters, the certificate of qualification for LNG experts, passenger navigation experts and on service record books combined with certificates of qualification.

## 1.2 Photograph in ES-QIN models

Does the photo prescribed in the ES-QIN for the various models need to satisfy biometric requirements?

(see document CESNI/QP (20) 95)

A biometric photo should be used on the crew-related documents where possible, ensuring as it does an accurate representation of the person in the document, and thus the ability to recognise the holder. A photo is biometric if it satisfies certain requirements that help facilitate the photo's facial recognition. The requirements differ very widely at international level; the typical requirements are as follows:

- Frontal shot
- Defined position of the head within the photo
- Unstructured background
- Neutral facial expression
- Good illumination with no reflections or shadows on the face and background.

## 1.3 Serial number of the service record book (SRB)

Since there are two models of SRB, will the same serial number be used twice, once for each model?

(see document CESNI/QP (21)m 112)

In principle a distinct serial number for these two documents should be given (especially last four digits) even though the chances that someone might possess two documents with the same number are very little. In any case the CID will be combined with the number of the document on the first page.

Should the number that is mentioned on each bottom page of the service record book take into account the distinction EU and RH?

(see document CESNI/QP (21)m 112)

The implementing regulation (EU) 2020/182 states that the serial number must refer to the ERDMS code which also includes the mentions 'RH' or 'EU'. The distinction "RH" and "EU" must therefore be included in the full serial number and so on the first page of the SRB and in ECDB.

The number to be mentioned on each page of the service record book should also take into account the distinction "RH" and "EU".

## 1.4 Serial number of the logbook

How should the “serial number of the logbook” on the first page of the logbook be entered?

(see document CESNI/QP (22) 50 rev.3)

In the past, the authorities have not (only) filled in the abstract serial number of the logbook but (also) the consecutive number giving the number of the logbook in relation to the craft in question (e.g. 1, 2 or 3). This way of filling in the logbook generated an added value; there was one more piece of information given.

To reflect this, in the field “serial number of the logbook” on page 1 of the logbook the long serial number can be combined with the consecutive number both numbers separated by a hyphen, e.g. LBKRHBE010001-2 (2 being the consecutive number of the current logbook following the previous logbook number 1 when this one is filled). It should however be noted that this does not mean that a second edition of the logbook bearing number LBKRHBE010001 is in circulation.

N.B. In the EHDB the additional number behind the hyphen cannot be entered.

## 1.5 Definition of the four-digit “document number” that is part of the serial number

How is the four-digit “document number” (SSSS) attributed, which is part of the serial number, for service record books with certificates of qualification, service record books and logbooks?

(see document CESNI/QP (20) 81 rev. 2)

For service record books with certificates of qualification, service record books and logbooks the four-digit “document number” is a serial number for the relevant document type of the issuing authority in question. It is to be assigned independently of the document holder or vessel for which the book is issued.

Examples: The first service record book issued by authority X is assigned the number 0001, the second 0002, irrespective of whether it is issued for the same person:

- 1) The Austrian competent authority issues the first service record book for person X. The document carries the following serial number: 12345678SRBEUAT010001.
- 2) The same Austrian competent authority issues the second service record book to another person Y. The document carries the number 78945612SRBEUAT010002.
- 3) The Austrian competent authority could therefore issue the second service record book to person X, which could for example carry the number 12345678SRBEUAT010152.

How is the four-digit “document number” (SSSS) attributed, which is part of the serial number, for certificates of qualification for boatmasters, LNG and passenger navigation experts?

(see document CESNI/QP (20) 81 rev. 2)

For certificates of qualification, the four-digit “document number” is a serial number for the relevant document type of the individual concerned for all certificates of qualification (including “qualifications entered in the model service record book combined with certificates of qualification”). It is independent of the issuing authority.

Examples: the first certificate of qualification as a boatmaster for person A issued by authority X receives the number 0001, the second certificate of qualification for boatmasters for person A receives the number 0002, irrespective of whether it is issued by authority X or another authority:

- 1) The Dutch competent authority number 1 issues the first Rhine certificate of qualification as a boatmaster to person A. The certificate carries the number 87654321QRH01NL010001.
- 2) The same Dutch competent authority could at the same time issue the first radar certificate to person A. The certificate carries the number 87654321SPRNL010001.
- 3) Later, the French competent authority number 1 issues the second certificate of qualification as a boatmaster to person A. The certificate carries the number 87654321QRH01FR010002.

## 1.6 Restrictions and mitigation measures related to fitness: Information to be entered in free text in certificates of qualification

Regarding restrictions and mitigation measures related to medical fitness, how should the two-digit codes 07 to 09 be entered in the certificate of qualification and in the service record books combined with certificates of qualification for crew members other than boatmaster?

(see document CESNI/QP (21) 52 rev. 1)

The two-digit codes must be entered, directly followed by the free text without repeating the description of the limitation as provided for by code 07 to 09.

In terms of free text following entry 07, the ENI shall be indicated. If no ENI is available, the vessel name shall be entered.

In terms of free text following entries 08 and 09, the name of the vessel area and the name of the task shall be entered in the language in which the certificate is issued. The competent authority may decide to repeat the area/task in a foreign language that is widely understood in Europe (English or German).

## 1.7 Cover page

What should be on the cover page of the service record book?

(see document CESNI/QP (20) 39 final)

The cover page (light blue colour: Pantone 290C) may bear the inscription “Service record book” or “Service record book combined with the certificates of qualifications” (in the corresponding language) to facilitate the identification of the document. In addition, the cover page may include the name of the country and flag as on page 1.

What should be on the cover page of the logbook?

(see document CESNI/QP (20) 39 final)

The cover page (red: Pantone 187) may bear the inscription “Logbook” (in the corresponding language) to facilitate the identification of the document. In addition, the cover page may include the name of the country and flag as on page 1.

## 1.8 “Page 1 of the model”

What does “page 1 of the model” refer to for the models of the service record book combined with certificates of qualification and of the service record book? The cover page or the first inner page?

*(see document CESNI/QP (20) 39 final)*

Page 1 of the model” contains information about the holder and issuance of the document. According to the physical characteristics of the document, Pantone colour light blue 290C is to be chosen for the cover page with the background colour white for the inner pages.

The cover page is not page 1 and is an additional page to the model. “Page 1 of the model” refers to the first inner page with information about the holder and issuance of the document as required by the model. Page 1 and following have a white colour background.

What does “page 1 of the model” refer to for the model of the logbook? The cover page or the first inner page?

*(see document CESNI/QP (20) 39 final)*

“Page 1 of the model” contains information about the issuance of the document. According to the physical characteristics of the document, red Pantone 187C is to be chosen for the cover page with the background colour white for inner pages.

The cover page is not page 1 and is an additional page to the model. “Page 1 of the model” refers to the first inner page with information about the holder and issuance of the document as required by the model. Page 1 and following have a white colour background.

## 1.9 Instructions for the issuing authorities: examples of a completed entry for service time and a completed page on navigation times and which sectors have been navigated on

Can these pages with examples be integrated into the service record book, although they are not marked as “page x of the model”?

*(see document CESNI/QP (20) 39 final)*

The pages “instructions for the issuing authorities” may be integrated in the document issued to users but only at the very end, as additional pages to the document issued. Providing for an example is beneficial to users and contributes to the proper completion of the documents.

These pages cannot be inserted within the model as this would be a modification of the model (with impact on the page numbering and content).

## 1.10 Issuing a specific authorisation to a holder of an existing certificate of qualification

In which State may the holder of the certificate of qualification apply for the reissue of the certificate of qualification?

*(see document CESNI/QP (21) 44 rev. 2)*

A holder of a certificate of qualification issued by State A obtains a specific authorisation in another State B. The latter will inform State A via the ECDB that the holder has obtained a new specific authorisation. The holder shall receive a new certificate of qualification including the new specific authorisation.

There is no automatic way for a State to reissue a certificate on the basis of the ECDB update alone. The holder must formally apply for the reissue of the certificate. The new certificate of qualification including the new specific authorisation shall always be issued by the issuing authority of the original certificate of qualification. The holder shall therefore apply for its reissue only in State A, which issued the original certificate and which holds all the necessary information to reissue the certificate.

### 1.11 Retrieval of issued certificates of qualification

What procedure should be followed in case a certificate of qualification that has been issued, paid for and is available, has not been received by the holder (e.g. unknown recipient at delivery address, certificate not collected on site, etc.)?

*(see document CESNI/QP (21) 44 rev. 2)*

The issuing authority must allow sufficient time for the holder to collect the certificate. In case a certificate of qualification that has been issued, paid for, is available and is marked as active, is not retrieved by its holder before the deadline set by the issuing authority, the dataset of the certificate must be marked as destroyed.

If the certificate is not retrieved, or is returned to the issuing authority, due to the death of its holder, the dataset must be deleted.

### 1.12 Validity of combined service record books

Can the service record book combined with an expired certificate of qualification still be used or does the expiration of the certificate of qualification affect and invalidate the rest of the document?

*(see document CESNI/QP (21) 04)*

The service record book and the certificates of qualification are combined in one single model. However, they are considered as two different documents. An expired certificate of qualification has no impact on the validity of the service record book which remains valid and can continue to be used.

### 1.13 Issuance of subsequent service record books

What happens when all the SRB pages are full?

*(see document CESNI/QP (20) 101)*

Once all the SRB pages are full, the holder receives a new SRB, which is given a new sequential number. The qualifications entered in the old SRB are carried over into the new SRB; this can be done by a different authority than the one that issued the original qualifications.

When renewing a service record book, are the qualifications entered with all the original information, or are they given a new number and a new date of issue?

*(see document CESNI/QP (20) 101)*

In the event of a new SRB being issued, the qualifications remain unchanged, all the information is copied into the new book. The qualifications' original date of issue should be entered in the new SRB and the original sequential number should be retained.

Which authority is to be entered in the new service record book as the “issuing authority”?

(see document CESNI/QP (20) 101)

The authority to be entered under “issuing authority” is always the one that issued the qualification, according to the ECDB.

Is the authority issuing a new SRB allowed to authenticate with its stamp the entry of qualification that was entered in the previous SRB by a different authority and stored in the ECDB?

(see document CESNI/QP (20) 101)

The entry of the qualification in the new SRB is only a copy, which can also be issued by another authority. The issuing of the copy is to be authenticated by the stamp and signature of the authority issuing this entry, even if it did not enter the original qualification in the previous SRB.

## 1.14 Administration of replacement documents in case of loss, theft or destruction

Which approach should be followed when issuing a replacement document in case of loss, theft or destruction of a certificate of qualification as a boatmaster, LNG expert or passenger navigation expert?

(see document CESNI/QP (21) 29 rev. 2)

In case of loss, theft or destruction of a certificate of qualification as a boatmaster, LNG expert or passenger navigation expert, a new certificate must be issued.

The new certificate must

- be issued by the same issuing authority which issued the lost, stolen or destroyed document;
- bear a new serial number and a new issuing date;
- incorporate all the other previous data contained in the lost, stolen or destroyed document, including the original expiry date.

Upon request, and if all conditions for issuing a new certificate are met, a new certificate with a new expiry date can be issued. It is up to the competent authority to assess these aspects.

Which approach should be followed when issuing a replacement document in case of loss, theft or destruction of a combined service record book?

(see document CESNI/QP (21) 29 rev. 2)

In case of loss, theft or destruction of the single document combining the service record book and the certificates of qualifications registered in the ECDB, a new combined service record book can be issued by any authority with a new serial number and a new issuing date.

The certificate of qualification as apprentice, deckhand, boatman, able boatman or helmsman contained therein are copied/inserted in the new SRB. The information on the qualification remains unchanged, i.e. the serial number, the date of issue and the issuing authority. Only the stamp and signature of the authority that issued the new (combined) SRB are inserted. In registers and ECDB, nothing changes regarding the (lost) qualifications.

### What is the procedure when issuing a replacement document in the event of the loss, theft, or destruction of a logbook?

(see document CESNI/QP (22) 19)

If only the logbook has disappeared, then the replacement logbook document can be issued by any competent authority, provided that the attestation of the issuing of a logbook is submitted at the same time. The new logbook should feature a new serial number and new date of issue.

### What is the procedure if the certificate on the release of the logbook has disappeared?

(see document CESNI/QP (22) 19)

If only the certificate has disappeared, then only the authority that issued the certificate that has disappeared can replace it, because it is also this authority that collates the “follow on certificates” (follow on logbook entries). Consequently, it is only this authority that possesses all the necessary data for checking whether a replacement may be issued. The replacement certificate then already contains the list of all follow on logbooks issued up to that point.

### What is the procedure if both the certificate on the release of the logbook and the logbook itself have disappeared?

(see document CESNI/QP (22) 19)

If both the certificate on the release of the logbook and the logbook itself have disappeared, then the authority that issued a new replacement logbook cannot issue a new certificate, because it is not in possession of the data in the previously issued logbooks.

In this case, the authority that issued the certificate issues a replacement certificate of the certificate on the release of the logbook with the facts as it last knew them. Upon presentation of this replacement certificate, an authority that is responsible for issuing logbooks, issues a replacement logbook. The new logbook should feature a new serial number and new date of issue.

### What is the procedure when issuing a replacement service record book that is not combined with a certificate of qualification in the event of a service record book being lost, stolen or destroyed?

(see document CESNI/QP (22) 19)

To ensure that navigation time is entered, the replacement service record book may be issued by any competent authority, provided that the boatmaster presents a certificate of qualification as a boatmaster. The new service record book should feature a new serial number and new date of issue. The authority issuing the replacement service record book amends the status of the service record book that has disappeared in the database accordingly.

## 1.15 Exchange SRB

The model of the service record book combined with certificates of qualification contains on pages 2 and 3 space to fill in the (Union and/or Rhine) certificates of qualification as apprentice, deckhand, boatman, able boatman and helmsman and other certificates concerning qualifications relevant for inland navigation.



When exchanging an old service record book for a new service record book combined with certificates of qualifications, should all the old qualifications of the personnel be filled in or only the “highest” one?

(see document CESNI/QP/QM (23) 01 rev.1)

In principle, for practical reasons the highest qualification on operational level is added in the service record book combined with certificates of qualification because there is limited space in the document. For example, if the qualifications of boatman, able boatman and helmsman were filled in the old service book, only the qualification of helmsman has to be filled in the new service book when exchanging.

In addition, and according to the model, on page 3 of the document, certificates concerning qualifications of personnel that is not covered by the Directive such as the engine personnel can be filled in. The qualification of apprentice also needs to be filled in, as this qualification is only valid for the time of the training programme.

## 1.16 Correction of already issued certificates of qualification, service record books and logbooks

Which approach should be followed when an already issued certificate has to be corrected (e.g. because of typing errors)?

(see document CESNI/QP (21) 39 rev. 2)

In case of detection of errors in an already issued certificate, the certificate has to be replaced with a corrected certificate by the same issuing authority.

The status of the dataset of the erroneous dataset is set to “destroyed”.

The new certificate has to bear a new serial number and a new issuing date. The issuing date of the corrected certificate must be the date of destruction of the erroneous certificate.

## 1.17 Suspension of certificates of qualification

Which examples can be given for reasons for suspending temporarily the validity of a certificate of qualification and applied durations?

(see document CESNI/QP (21) 55)

The validity of a certificate of qualification may be temporarily suspended by any Member State if it considers it necessary for reasons of security or public order (Article 14(2) Directive (EU) 2017/2397). The Member State that suspends the validity of a certificate must set an end date to the application of its decision.

The following examples could be considered by the competent authorities with regard to the reasons and duration of suspension:

	Reasons for suspension	Duration of suspension
Germany Netherlands Switzerland	Driving a watercraft under the influence of alcohol or drugs, also in connection with a navigation accident	DE: Often approx. 6 months NL: duration is not fixed and depends on the particular case
	Unclear health conditions, e.g. epilepsy, heart disease, neurological disease	In case of doubt as to fitness: <ul style="list-style-type: none"> <li>- Suspension ceases as soon as fitness is demonstrated.</li> <li>- Suspension ends with withdrawal of the certificate if fitness is not demonstrated.</li> </ul>
Switzerland	The document may also be confiscated / suspended where there is a suspicion that the document has been forged	The duration of the suspension will differ according to the circumstances.

	Reasons for suspension	Duration of suspension
	and/or the holder has fraudulently acquired the document (e.g. during the examination).	
	The certificate of qualification may also be confiscated / suspended in the event of repeated breaches of national and official regulations.	
<i>Austria</i>	Requirements for the qualification (e.g. medical fitness) are obviously no longer complied with	to be defined in the procedure, should coincide with the duration of the withdrawal process
	Repeated gross violations of navigational regulations	to be defined in the procedure
	Impairment as a result of alcohol (blood alcohol level of at least 0.5 per mille) or other intoxicating agents, if navigating a vessel, bringing it into operation, or attempting to do so. Also applies if a breathalyser test is refused despite being obviously under the influence.	6 months, repeat offence, 1 year, second repeat offence, 2 years
	The holder of the certificate of qualification had his or her certificate of qualification, issued in accordance with railway, aviation or motor vehicle law, legally revoked for operating a vessel as construed by these provisions while under the influence of alcohol or intoxicating agents.	For the duration of this suspension
	Impairment as a result of excessive agitation or fatigue, if navigating a vessel, bringing it into operation, or attempting to do so.	Until full mental and physical capacity has been regained
<i>Bulgaria</i>	Any ship's crew member, who performs the official duties thereof with more than 0.25 mg/l alcohol in the breath or with a blood alcohol level exceeding 0.5 per mille or under the influence of other intoxicating agents, shall be liable to suspension from practice of the activity in connection with which the violation has been committed, for a period of six months and a fine. Upon a repeated violation, the sanction shall be suspension from practice of the activity in connection with which the violation has been committed, for a period of one year and a fine.	
	Any shipmaster, pilot or crew member, who in the course of discharge of the official duties thereof culpably causes a shipwreck or an average on board the ship, shall be liable, unless the act constitutes a criminal offence, to suspension from practice of the activity in connection with which the violation has been committed, for a period of six months or exceeding this duration but not exceeding two years, and to a fine.	
	Any shipmaster or crew member, who by a culpable act or omission has suffered the ship to sail in violation of the requirements for safety and protection of the environment from pollution or to be detained according to the procedure for control of ships in ports, shall be liable to a fine and to suspension from occupation of the position in connection with which the violation has been committed for a period of two months or exceeding this duration but not exceeding one year. A repeated violation shall be punishable by a fine and suspension from occupation of the position in connection with which the violation has been committed for a period from one to two years.	
	Any person, who draws up or uses a false official document or who forges the contents of an official document related to attainment of competency under Merchant Shipping Code, unless the act constitutes a criminal offence, shall be	

	Reasons for suspension	Duration of suspension
	liable to a fine and to suspension from holding a position on a ship for a period of five years.	
	Any shipmaster, who has allowed a person to perform a position on board a ship without having the required legal capacity for that position, shall be liable to suspension from holding a position on a ship for a period of two years, unless the act constitutes a criminal offence.	
	Disputed or unclear cases in medical certification and re-certification.	In case of doubt as to fitness: <ul style="list-style-type: none"> <li>- Suspension ceases as soon as fitness is demonstrated.</li> <li>- Suspension ends with withdrawal of the certificate if fitness is not demonstrated.</li> </ul>

### What does the suspending authority?

(see document CESNI/QP (21) 38 rev. 1)

The suspending authority takes the decision, sets an end date to the suspension and records the information in the ECDB. The issuing authority is informed about that and also enters the suspension in its national register.

### What happens in the case of a physical confiscation of the certificate whose validity has been temporarily suspended?

(see document CESNI/QP (21) 38 rev. 1)

On the basis of its national law, a Member State may decide to physically confiscate a certificate whose validity has been temporarily suspended.

Example: State A has issued a certificate. State B suspends this certificate and informs the issuing State A.

If on the basis of national law, State B decides to confiscate the suspended certificate, the physical format of the certificate remains with State B which should

- return it to the holder at the end of the suspension, if the certificate has not been withdrawn in the meantime;
- send it to the issuing State if the certificate has been withdrawn in the meantime.

The State confiscating a certificate should therefore always ask the holder for a postal address for returning the certificate. This address should be forwarded together with the certificate if it is sent to the issuing authority.

## 1.18 Withdrawal of certificates of qualification

### How should authorities cooperate if the certificate is withdrawn and if the validity of the certificate was suspended by another authority than the issuing authority?

(see document CESNI/QP (21) 38 rev. 1)

If the certificate is withdrawn and if the validity of the certificate was suspended by another authority than the issuing authority, the authority which took the decision to suspend its validity should send the confiscated document to the issuing authority.

## 1.19 Entering specific authorisations on hard copies of certificates of qualification

Regarding the hard copy of the certificates of qualification as a boatmaster, instructions for the issuing authorities outline the procedure for completing no.10 of the front page:

“10. Specific authorisation(s) coded: R (for sailing with the aid of radar); M (for sailing on inland waterways with a maritime character); Stretches for specific risk as coded in ERDMS; C (for sailing large convoys)”.

**How should specific authorisations for inland waterways with specific risks be indicated on the hard copy of a certificate of qualification as a boatmaster?**

(see document CESNI/QP/QM (24) 01 rev. 2)

On the front page of the certificate of qualification, under no.10, only the letter of the specific authorisation should be entered: R (for sailing with the aid of radar); M (for sailing on inland waterways with a maritime character); C (for sailing large convoys). In the instance of a specific authorisation for stretches with specific risks, the stretch with specific risks as coded in the ERDMS<sup>1</sup> has to be directly entered (for example: RH-0493-0857). Other letters than those mentioned are not allowed. See the example below:

NEDERLAND

**EU-KWALIFICATIECERTIFICAAT  
BINNENVAART**

Schipper

1.

2.

3a.

3b.

4.

6.

7.

8.

9.

10. R  
M  
RH-0334-0857

11.

Only if no space is left on the front side for additional stretches, they can be recorded on the extra space provided at the back of the certificate. The 18-digit serial number of the specific authorisation is only needed when registering the certificate in the ECDB and should not be filled in on the hard copy.

## 1.20 Completing the service record book and exception for the helmsman

**How is the helmsman's decision not to fill in his/her service book documented?**

(see document CESNI/QP/QM (24) 40 rev. 1)

The boatmaster is responsible for entering the specific data on the journeys made into the service record book of all crew members, except for the helmsman who has explicitly waived this right.

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<sup>1</sup> For lists and codes for data exchange with ECDB and their integration into the ERDMS, see the corresponding FAQ in the collection of FAQs on the administration of certificates.

A helmsman, who does not wish to obtain the qualification as a boatmaster, may forgo the recording of his/her navigation time. To do so, the helmsman has to enter the following handwritten statement, duly dated and signed, on page 4 of his/her service record book “does not wish to obtain a certificate of qualification as a boatmaster”.

If a helmsman initially chooses not to have his/her navigation time recorded, but later reverses this decision (e.g., to pass a management level examination to qualify as a boatmaster), only the navigation time as a helmsman (minimum 180 days) completed after this new decision has been duly documented in the same manner (handwritten statement duly dated and signed) can be taken into account.

This procedure applies until e-tools are implemented.

## 1.21 Instructions for completing the service record book

### How should the section “Service time” 1 of the service record book be completed?

A new “**Service time on board, name of craft**” section should be completed when the holder of the service record book:

- Begins his/her duties on board  
or
- Changes his/her duties on board the same craft.

“**Holder assumed service on (date)**” indicates the day on which the holder of the service record book begins his/her activity on board. “**End of service (date)**” indicates the day on which the holder of the service record book ceases his/her activity on board.

### How should page 23 “Navigation time and stretches of inland waterways sailed over the last 15 months” of the service record book be completed?

- The different journeys shall be entered in order to be taken into account for calculating navigation times and to provide proof of the stretches covered. The place of departure shall be entered under B, “**Journey from ...**” and the place of destination furthest downstream or furthest upstream (final destination) shall be entered under “**to ...**”. The k.p. may be given for greater accuracy. An entry under “**via ...**” is not required unless the vessel takes another waterway or returns from another waterway.
- A monthly entry for the stretches covered, the number of voyages made (from the place of departure) and the total navigation period is sufficient in the case of regular duty on board a craft over a short distance (e.g. 10 identical successive voyages) or in the case of shuttle services (e.g. day excursions for the carriage of passengers in local navigation, worksite traffic).
- Under:
  - C = “**Start of journey (date)**”, the day of departure from the place of departure should be entered;
  - D = “**Days of interruption**”, the number of days during which the journey has not continued should be recorded. In the event of a journey without interruption, enter “0 (zero)”;
  - E = “**End of the journey (date)**”, the day of arrival at the place of destination should be entered;
  - F = “**Total number of navigation days**”, the number of days between “Start of journey” (C) and “End of the journey” (E), after deducting “Days of interruption” (D), should be entered.

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<sup>1</sup> Page 3 in case of a single service record book (ES-QIN, Part V, Chapter 4), page 4 in case of a combined service record book (ES-QIN, Part V, Chapter 2).

G = Signature of the responsible boatmaster.

- A new line should be begun at each change of craft.
- Entries made in the service record book shall correspond to those of the logbook. The entries in the logbook) correspond if the details for the entire journey, from the day and place of departure to the day and place of arrival, match and if the total number of days interrupted to the journey (e.g. loading, unloading, waiting) shown in the logbook is entered under '**Days of interruption**' (D).
- On the page "Navigation time and stretches of inland waterways sailed over the last 15 months", the competent authority shall complete the line "**to be completed by the authority: total number of navigation days taken into consideration from this page**".

## 1.22 Expiry date on a certificate of qualification as a boatmaster and renewal of a certificate

(see document CESNI/QP/QM (25) 21 rev.3)

How is the expiry date of a certificate of qualification before the holder's 60th birthday determined?

According to Article 11(5), "*Union certificates of qualification as a boatmaster shall be valid for up to a maximum of 13 years*".

Two possibilities exist regarding the determination of the expiry date on the certificate, as long as at the age of 60, the expiry date is the holder's 60<sup>th</sup> birthday<sup>1</sup>.

### Interpretation 1 based on the holder's birthday

The applicant's birthday is considered when the certificate of qualification as a boatmaster is issued

The expiry date of the certificate of qualification is set to **one day before or on the applicant's birthday**. Therefore, a certificate of qualification is valid for 13 years from the applicant's birthday after the applicant receives the certificate of qualification as a boatmaster.

### Interpretation 2 based on the date on which the qualification was obtained

The certificate of qualification as a boatmaster is issued with a validity period of **13 years from the date on which the qualification is obtained** (or the exam is passed). This 13-year validity period is not aligned with the person's birthday.

#### Case example:

-An applicant is born on 17-01-2006

-(S)he obtains a diploma or passes an exam on 13-06-2024 (at the age of 18)

In this case, the following 2 interpretations may apply:

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<sup>1</sup> Given the differing approaches currently applied concerning the requirement to submit a medical certificate at each renewal, the holder should, at a minimum, provide evidence of their medical fitness at the age of 60.

Interpretation 1	Interpretation 2
<p>Following interpretation 1, the competent authority issues a certificate of qualification with an expiry date of 17-01-2037.</p> <p>By this time, the applicant will have reached the age of 31.</p> <p>The next renewals will be:</p> <p>-1<sup>st</sup> renewal: 17-01-2050 - age: 44 years  -2<sup>nd</sup> renewal: 17-01-2063 - age: 57 years  -3<sup>rd</sup> renewal will be valid for 3 years until the applicant's 60<sup>th</sup> birthday.</p>	<p>Following interpretation 2, the certificate will be valid for 13 years from the date of issue, i.e. until 13-06-2037.</p> <p>The next renewals will be:</p> <p>-1<sup>st</sup> renewal: 13-06-2050  -2<sup>nd</sup> renewal: 13-06-2063  -3<sup>rd</sup> renewal: 17-01-2066 – age: 60 years<sup>1</sup></p>

### How and when is the expiry date determined after the holder's 60th birthday?

According to Article 23(3) of the Directive, holders of a certificate of qualification as a deck crew member at entry level, operational level and management level must demonstrate medical fitness in accordance with paragraph 1 at least every five years from the age of 60. From the age of 70, the holder must demonstrate medical fitness in accordance with paragraph 1 every two years.

#### **Interpretation 1 based on the holder's birthday**

Certificates of qualification are renewed every five years starting from the holder's 60<sup>th</sup> birthday.

The certificate is renewed at the ages of 60, 65, 70 and 72, and then every two years thereafter.

#### **Interpretation 2 based on the date of the certificate**

The expiry date of the certificate of qualification is not necessarily tied to the holder's 65<sup>th</sup>, 70<sup>th</sup>, 72<sup>nd</sup> or 74<sup>th</sup> birthday. Indeed, the holder's birthday is not directly relevant for determining the expiry date of a certificate once the holder is over 60.

In this interpretation, there is a **special case**. If a 68- or 69-year-old person obtains a new certificate, the expiry date should be 73 or 74, because the holder is under 70 and the interval for medical examinations is five years. However, as the Directive states that for individuals aged 70 and over, the interval is only two years, the certificate will be issued until the 72<sup>nd</sup> birthday in this case.

**Case example: the medical fitness of an applicant is limited to 3 years when the holder is 60 years old. The applicant is now 63 years old and wants to renew the certificate of qualification.**

**In this case, the following 2 interpretations may apply:**



Interpretation 1	Interpretation 2
Following this interpretation, the competent authority will issue a certificate valid up to the age of 65 years. Consequently, the certificate will be valid for 2 years.	Following this interpretation, the competent authority will issue a certificate valid for five years from the age of 63. The certificate will expire after those 5 years.

## 2 Section II: Compilation of questions and answers on Directive (EU) 2017/2397 from Commission services

These views were expressed by Commission services in the Commission expert group on social issues in inland navigation (25 February 2021) and/or in bilateral exchanges between Commission services and Member States.

### 2.1 Article 2 – scope

The scope of the directive includes passenger vessels but what if the passenger vessel service is carried out free of charge by a governmental body?

In accordance with Article 2(1) (d) of Directive (EU) 2017/2397 crew and experts operating passenger vessels (including ferries) are included within the scope. This is regardless of the status of its owner/management authority (private or public) and whether fees are charged or not for the transport service.

### 2.2 Article 4 - exemptions, manning

Are Member States allowed to lay down a requirement to have a certificate of qualification at operational or management level, i.e. not necessarily the certificate of qualification as a boatmaster, for boatmasters sailing a vessel falling within the scope of the Directive (in our case free-floating ferries) on national inland waterways that are linked to the navigable network of another Member State?

Directive (EU) 2017/2397 lays down, in particular, the conditions and procedures for the certification of the qualifications of persons involved in the operation of the vessels navigating on Union inland waterways that are covered by the scope of the Directive. Its Article 4 obliges the Member States to ensure that deck crew members who navigate on Union inland waterways carry either a Union certificate of qualification as a deck crew member issued in accordance with its Article 11 or a certificate recognised in accordance with its Article 10(2) or (3).

Any crew member must be therefore in possession of a Union certificate or a recognised certificate. The Directive does not allow Member States to issue any other certificates of qualification that would attest that a person fulfils the minimum qualification requirements laid down in the Directive. The Directive (its Article 7) only gives an option for the Member States to grant exemptions from certain requirements of the Directive to persons operating exclusively on national inland waterways that are not linked to the navigable network of another Member State. Note that the Directive regulates the questions of recognition of qualification and does not aim at harmonising safe manning requirements. It is therefore for the Member States, in compliance with Union law, to lay down such requirements, as appropriate, in order to ensure safe navigation.

If the national law of a Member State requires a boatmaster to be aboard, the boatmaster must hold a Union certificate of qualification as a boatmaster (or equivalent certificate recognised in accordance with Article 10(2) or (3)), except for persons operating exclusively on 'unconnected' national inland waterways where the Member State has granted an exemption under Article 7.

We draw your attention to the fact that the Directive also provides in its Article 38(5) for transitional measures for crew members working on ferries, including boatmasters.

### 2.3 Article 7 – notification of exemptions

Can you clarify the procedure required by Article 7(3)?

According to Article 7 (1), Member States must inform the Commission of exemptions concerning:

- the requirement to carry a certificate of qualification issued in accordance with the Directive for deck crew members, passenger navigation experts and LNG experts;
- the requirement for boatmasters to hold specific authorisations;
- the obligation to fill in and/or keep a service record book and logbook.

Such exemptions may only apply to persons who operate exclusively on national inland waterways that are not linked to the navigable network of another Member State.

If a Member State grants such exemptions, it is suggested that the Member State informs the Commission by letter to the Director-General of DG MOVE or to the Director for Waterborne Transport so that this information can be made publicly available. The letter should clearly indicate which exemptions are granted to whom and on which inland waterways within its territory.

### 2.4 Article 7(3) – notification waterways not linked

Is it correct that Member States are not supposed to notify the individual waterways on which they exempt the persons from the relevant obligations?

The objective of Article 7(3) of Directive 2017/2397 is to know if a Member State makes use of the possibility of exemption and if yes if it applies to all persons refers in Article 4(1), Article 5(1) and Article 6 who operate exclusively on national inland waterways that are not linked to the navigable network of another Member State.

If a Member States decides to apply the exemption for all these persons on all national inland waterways that are not linked to the navigable network of another Member State, it would be sufficient to only make such declaration. If the scope of the exemption is limited to certain categories of persons or to some non-connected inland waterways, this should be made explicit (e.g. by listing all inland waterways where exemption applies and to whom, or stating it only applies to those persons navigating on the lakes, or only to crew members other than boatmasters on all non-connected waterways, or all these persons on all non-connected waterways but river named....).

## 2.5 Article 9 – codification of stretches with specific risks

Can we designate consecutive stretches of inland waterway with specific risks with one code?

Considering that we accepted that there will be a free field to insert manually sub-SSR, the free field could also be used to write down a combination of stretches on the same waterway. So, in the case you mentioned, the three SSR could be selected “D—1880-1920 D--2001-2036 D—2074-2081” or “D—1880-2081” could be inserted by the competent authority.

## 2.6 Article 11 – additional criteria

Can a Member State limit in its national law the persons applying for certificates of qualification to a certain group of persons (for example, those working in the territory of the State or for a company established in that State)?

Article 11 (2) provides that Member States shall issue Union certificates of qualification after verifying the authenticity and validity of the documents provided by applicants and having verified that such a valid certificate has not already been issued to them. The supporting documents required relate to the conditions listed in the first paragraph of Article 11. Like Directive 96/50/EC, Directive (EU) 2017/2397 does not in fact establish a connecting factor for applicants. The ‘criteria’ or ‘conditions’ for issuing are therefore harmonised. They are established by Article 11 (1). Consequently, for the issue of a certificate of qualification covered by the Directive, a Member State cannot establish additional criteria such as, for example, the requirement of a professional connection with the Member State concerned.

## 2.7 Article 11 – Certificates of qualification

What is the legal status of an old Union certificate of qualification (e.g. as a helmsman) if the holder is issued a new, higher level certificate (e.g. Union certificate of qualification as a boatmaster)? Can you hold several certificates of qualification?

Article 11(2) provides that Member States shall issue Union certificates of qualification after having verified the authenticity and validity of the documents provided by the applicants and after having verified that the applicants have not already been issued a valid Union certificate of qualification.

On the other hand, the Directive does not contain any provisions explicitly providing that the issuing of a (higher) certificate of qualification affects the validity of a (lower) certificate of qualification. It follows that in practice a crew member may have several certificates of qualifications. In such a case, when the competent authorities consider the suspension or withdrawal of certificates, such a suspension or withdrawal would require each of the certificates held by a crew member to be considered separately.

## 2.8 Article 11 – new certificate after withdrawal

In accordance with Article 11(2) of Directive (EU) 2017/2397, if a person already holds a Union certificate of qualification, another State may not issue a certificate of the same type. Can another State issue a new certificate after the original certificate has been withdrawn?

### MOVE preliminary views

A Member State B is in principle competent to issue a new certificate to a crew member after the original certificate has been withdrawn in Member State A, if the applicant meets the conditions of Article 11.

However, in accordance with Article 11(2), Member State B will have to verify whether the applicant has not already been issued a valid Union certificate of qualification, and therefore will be aware that the applicant's certificate has been withdrawn by another Member State. Accordingly, Member State B must take into account the fact and the reasons of withdrawal, to the extent that this may be necessary in order to properly assess whether the applicant meets the conditions of Article 11 and Annex I.

## **2.9 Article 11 – new certificate after suspension**

Is it correct to assume that no further certificate of the same type may be issued during a suspension, even if the requirements of the Directive are met?

### MOVE preliminary views

We would understand from Article 11(2) that a new certificate cannot be issued, since the person continues to hold a valid (but suspended) certificate.

## **2.10 Article 11(1) and Annex I – administrative compliance**

Can a Member State set additional administrative compliance requirements than those put in Annex I?

### MOVE preliminary views

Article 11(1) point b) refers to the minimum requirements laid down in Annex I. This should be understood as an exhaustive/complete list of minimum requirements (with minimum thresholds eg. minimum age, training with minimum duration). Thus, Member States cannot set additional requirements as conditions for the issuing of the Union certificates under Article 11, but, where relevant, may choose to apply a higher threshold.

## **2.11 Article 12 – specific authorisations**

State A issues a Union certificate of qualification as a boatmaster for which the holder acquires a specific authorisation in State B at a later date. According to EU law, the specific authorisation must be entered on the Union certificate of qualification as a boatmaster (for example with an "R" for the specific authorisation for sailing with the aid of radar). Is it correct that the holder of the (new) specific authorisation must have a new Union certificate of qualification on which the authorisation is then to be registered?

Article 12(4) states that "Member States shall ensure that the competent authority that issues Union certificates of qualifications to boatmasters specifically indicates in the certificate any specific authorization issued pursuant to Article 6 in accordance with the model referred to in Article 11(3). The validity of such specific authorization shall end when the validity of the Union certificate of qualification ends".

Hence, it is in principle the same authority that had issued the Union certificate of qualification (e.g. in State A) that should indicate any specific authorisation on it, also when the specific authorisation has been issued by another competent authority (e.g. in State B). This operation has no effect on the validity of the Union certificate of qualification (serial number and validity date remain unchanged). The specific authorization has its own serial number and its validity date is aligned with the one of the Union certificate of qualification.

## 2.12 Article 14 – who can suspend what

The Directive is addressed only to EU Member States. Can a Member State of the CCNR or a third country whose documents are recognised under Article 10(3) also suspend the validity of a certificate issued by an EU State and vice versa?

### Suspension of Union certificates:

a) EU Member States, be them parties to the CCNR or not, may suspend a Union certificate only on the basis of and in accordance with Article 14(2) of the Directive. Union certificates cannot be suspended by EU Member States based on the Rhine Regulations.

b) The Directive does not regulate the possibility of suspension of Union certificates by third countries. Hence, third country authorities cannot suspend the validity of Union certificates on the basis of Article 14(2) of the Directive (regardless of whether the certificates they issue are recognized or not in accordance with Article 10(2) or (3) of the Directive). Third countries could possibly suspend Union certificates on their own territories provided that this would be consistent with their international obligations.

### Suspension of certificates recognized by virtue of Article 10(2) or (3)

It may be inferred from Article 14(2) of the Directive that any EU Member State may temporarily suspend, with regard to the Union territory, the Rhine certificates or third country certificates respectively recognized in accordance with Article 10(2) and (3) of the Directive when such suspension is necessary for reasons of safety or public order.

## 2.13 Article 14 – withdrawal

### Can withdrawal be limited in time?

In accordance with Article 14(2) of the Directive, any Member State, thus, including the Member State that issued the Union certificate, may temporarily suspend the certificate where necessary for reasons of safety or public order. Hence, if the reason is temporary, the Member State that issued the Union certificate may temporarily suspend the certificate, without necessarily withdrawing it.

## 2.14 Article 14 – new certificate after withdrawal

The certificate could, for example, be withdrawn for reasons of medical fitness. What should be done if the holder once again complies with the medical fitness requirements? Should the old certificate be returned and the status in the ECDB restored? Or must a new certificate be issued with a new number? Is it correct to assume that the examination on competence does not need to be repeated in this case?

If a certificate is withdrawn, a new certificate (with a new number) can be issued if all the conditions of Article 11 of the Directive are fulfilled, which is for the national competent authority to assess.

## 2.15 Article 14 - suspension

State B may establish that there is a suspicion that the holder of a certificate issued by State A no longer complies with the requirements of Article 11. State B cannot withdraw the certificate but suspend its validity for safety reasons. State A would have to decide on the withdrawal.

In this case, does State B have to set an end date for the suspension or can it leave the decision to the issuing State?

State B must set an end date as Article 14(2) mentions that the suspension is temporary.

What happens to suspension if State A finds that the suspicion was unfounded and does not withdraw the certificate? Is the suspension nevertheless maintained? Or can State A overwrite the end date of the suspension registered by State B?

The decision regarding suspension can only be amended or withdrawn by State B. An appropriate way to approach such situation could be for State A inform State B of its assessment and State B could decide to amend or waive the suspension if justified.

Could State A, under its national law, extend or shorten the suspension period set by State B?

State A cannot modify the decision on suspension taken by State B. If the certificate is withdrawn by the issuing Member State, the suspension will lose its effect.

## 2.16 Article 14 – suspension and its effect

Can a Member State establish criteria for suspending certificates for reasons of safety (e.g. alcohol limits, number or seriousness of accident) and has that suspension effect in other Member States that may have adopted different criteria? Are local suspensions and withdrawals possible?



### MOVE preliminary views

It is in principle for each MS, in compliance with the general principles of EU law (e.g. the principles of proportionality, equal treatment, the right to effective legal protection), to apply the reasons of safety or public order which justify temporary suspension of a Union certificate under Article 14(2). In doing so, MS must take into account the objectives of the Directive and not undermine its effectiveness.

We would tend to say that suspensions and withdrawals under Article 14(2) have uniform effect in all the Union.

## **2.17 Article 14 – alcohol**

A police control on board has revealed a boatmaster with a highly alcoholised state. If there is no dependence on alcohol, the medical fitness requirements continue to be met. Can the boatmaster's certificate be withdrawn on the ground that the requirement of 'compliance with the administrative provisions' laid down in Article 11(1) (b) is no longer met, or can its validity be suspended only on grounds of security or public order? If sailing a vessel under the influence of alcohol is considered to be in breach of the required administrative compliance, is the requirement then no longer satisfied for an indefinite period?

Article 11(1)(b) of the Directive refers to minimum requirements laid down in Annex I. The requirement of 'compliance with administrative provisions' must be interpreted in combination with Annex I, which does not contain any requirements related to the issues of alcohol abuse raised by the question.

The abuse of alcohol or drugs could potentially lead to the establishment of medical unfitness in accordance with Article 23 of the Directive and Annex III. Moreover, in accordance with Article 14(2) of the Directive, Any Member State may temporarily suspend a Union certificate of qualification for reasons of safety or public order. Such reasons could indeed be linked to the offences related to alcohol abuse.

## **2.18 Article 15(2) – Article 39(3) – cooperation**

Who are the competent authorities of other Member States referred to under Article 15(2)?  
The states which issued the service record book?

If a Member State referred to in Article 39(3) does not appoint any authority under its national system to ensure the recording of navigation time if requested by a crew member and its validation, it is the responsibility of that Member State to establish a cooperation with another Member State to ensure that the rights of the crew member can be respected. Article 15 does not specify which exact cooperation mechanism should be put in place and with whom to make effective the rights and obligations referred to in this article.

## 2.19 Article 17 – fee for examination

### Is it possible to charge a fee for practical examinations?

The Directive does not oppose that Member States introduce reasonable and proportionate fees for exams, commensurate with the cost of the procedures and formalities.

## 2.20 Article 17 – Approved training programmes

### What happens for the students that have followed programmes approved after 18/01/2022?

Article 17 mentions that an applicant must demonstrate that they meet the standards of competence referred to in paragraph 1 by passing an examination that was organised either under the responsibility of an authority or as part of a training programme approved in accordance with Article 19. Article 19 lays down a number of conditions for the approval of training programmes. If the applicant did not follow a training programme that met these conditions, they should take an exam under the responsibility of an administrative authority referred to under Article 18. In other words, the starting date of the studies is not a criterion; nor the date of the approval of training programme. What matters is that the student has successfully completed an approved training programme which covered all the standards of competence for the concerned level.

Practically, if a training programme has not been approved, it can remain in existence, but the student will have to prove later that he/she masters all the competences as requested by the Directive by taking an exam organised by an administrative authority.

This said, if a training programme gets upgraded to Directive requirements after a student has started the programme, an extra module organised by the training institute could fill in the gaps so that their training programme can also be approved by the authority. In this case, the students could then get access to a certificate of qualification without an administrative exam and be considered as having completed an approved training programme. If such module would not be organised then, those students cannot be considered as having completed an approved training programmes covering all competence requirements.

## 2.21 Article 21(6) – simulators

### How should we interpret Article 21(6): “Member States shall ensure that access to simulators for assessment purposes is non-discriminatory”?

The principle of non-discrimination enshrined in the law is to enable all individuals to have equal access to the opportunities offered by society (in this specific case the practical examinations on simulators for the cases provided for in the Directive). This means that individuals or groups of individuals who are in comparable situations should not be treated less favourably simply because of a particular characteristic, such as sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation. The Treaty on the Functioning of the European Union (TFEU) prohibits discrimination on grounds of nationality.

## 2.22 Article 22(6) – one active SRB

To which SRBs applies the obligation under Article 22(6)?

Article 22(6) specifies that Member States shall ensure that crew members hold a single active service record book and that there is a single active logbook on the craft. However, Article 38(4) sets a specific transitional rule according to which service record books and logbooks issued prior to 18 January 2022 that were issued in accordance with rules other than those set out by this Directive may remain active for a maximum of 10 years after 18 January 2022. Article 38(4) therefore allows the service record books and logbooks issued prior to 18 January 2022 to be kept active during the transitional period, including in the situations where a crew member held more than one service record book issued prior to 18 January 2022.

## 2.23 Article 25 – database for non-connected Member States

Are the Member States which can apply Article 39(2) obliged to exchange the information in Commission's database?

The Member States that are not obliged to set up national registers referred to in Article 25(1) in accordance with Article 39(2) have however the obligation to exchange information with other Member States, in particular with respect to the suspension of certificates of qualification. This has to be done through the database referred to in Article 25(2) as provided for in article 14(2) and (3).

## 2.24 Article 25 – register

Article 25(1) requires from Member States to keep registers for Union certificates of qualifications, service record books and logbooks. These will feed the EU databases on crew and vessels. Should the EU databases be fed by a single national database or can they be fed by regional databases?

There are no requirements regarding the numbers of registers per Member State that will make available the required data to the Union databases. In accordance with Commission Delegated Regulation (EU) 2020/473, the Commission shall maintain contact with the Member States through a single contact point designated by each Member State among the competent authorities referred to in Article 26(g) of Directive (EU) 2017/2397.

## 2.25 Article 26 - Competent authorities

What do you mean by “competent authority”?

The competent authorities are those that are designated by the Member States within their territory to perform the functions enumerated under Article 26 of Directive (EU) 2017/2397. It can be any body that has the legally delegated or invested authority to perform the designated function.

## 2.26 Article 38 – restrictions from 96/50

What has to be done with restrictions like tonnes or kW when a boatmaster certificate according to Directive 96/50/EC is replaced by a Union certificate of qualification?

We understand it concerns mainly the certificates containing restrictions resulting from the application of Article 7(4) of Directive 96/50/EC.

We are of the opinion that, even though they are issued “in accordance with Directive 96/50” and accordingly are covered by Article 38 of Directive (EU) 2017/2397, the situation of those certificates is nevertheless objectively different from other certificates issued under Directive 96/50/EC (which do not contain restrictions – apart from those linked to the medical fitness).

In the absence of a clear solution in the text of Article 38, we would interpret that transitional provision as requiring that restrictions based on Article 7(4) of Directive 96/50 are also reflected in the Union certificates of qualification issued under Article 38. This would seem appropriate because:

- transitional provisions must be interpreted strictly, and their purpose is to safeguard the existing entitlements (see also recital 39 of Directive 2017/2397). Any upgrade of the entitlements as compared to those granted under Directive 96/50/EC would have to be explicitly provided for in the text,
- it follows from the legislative history of Article 7(4) of Directive 96/50/EC that the restrictions were intended to be permanent – thus, it would seem logical that they are carried on after the conversion;
- a comparison could also be drawn to the restrictions related to medical fitness, which will be recorded in the new certificate.

We are of the opinion that the provisions of Regulation (EU) 2020/182 do not oppose to including those restriction under item 11 of the model.

If your question concerned also ‘other’ restrictions: if a boatmaster’s certificate was not issued in accordance with the minimum requirements laid down in Directive 96/50 or if it is a national certificate issued on the basis of its Article 3(2), then it is not covered by Article 38 of Directive 2017/2397.

## 2.27 Article 38 – exchange of certificates

Can you clarify the requirements of day of navigation time (resp. 540, 900 and 1080) referred to under Article 38(3). If it is found that the current national requirements for boatman are *slightly* lower than those introduced by the Directive, does it mean that the boatman will first have to prove some 540 days of navigation time?

In accordance with article 38(3) where crew members apply for a Union certificate, Member States must ensure that a certificate of qualification is issued for which the competence requirements are similar to or lower than those of the certificate to be replaced. The transitional measures aim at safeguarding entitlements previously granted as far as possible. They are applicable only to the persons that do not apply for a Union certificate of qualifications in accordance with Article 11.

It is up to each Member State to determine for each type of qualification it issued before 18 January 2022 whether the new requirements set by the Directive are similar to the previous requirements set at national level. The result of such assessment could for example be reflected in a correspondence table. So, if the previous competence requirements for obtaining the qualification of boatman set by a Member State were similar to the Directive requirements, then the boatman can request the exchange of his national certificate against a Union certificate of qualification.

A Union certificate for which the requirements are higher than those of the certificate to be replaced can only be issued subject to the relevant proof of navigation experience.

## **2.28 Article 38 - exchange SRB**

**Which authority can exchange current SRB against a new one under the Directive?**

The Directive does not specifically state which authority exchanges a service record book for a service record book issued in accordance with the Directive. However, according to Article 4(2) for crew members other than boatmasters the Union certificates of qualification and the service record must be presented in a single document. Therefore, the competent authority exchanging a certificate of qualification (the one that originally issued it) will also issue the new service record book in such situations.

## **2.29 Commission Implementing Regulation (EU) 2020/182 –models**

**Are the models provided for in this Regulation to be considered uniform for all Member States or can they be adapted at graphic level with national specificity (e.g. Hologram, UV printing)?**

The requirements related to the physical characteristics are those specified in the Regulation under the dedicated section for each model. Where necessary for technical reasons, Member State may add some limited technical variations, provided that the certificate is issued in accordance with the model.

**The Regulation provides for a model document combining Union certificates of qualifications and service record books. Will there be printers recognised at European level? How will the QR code be assigned and how will it be placed on the first page of the paper document?**

There will be no recognised printers at EU level. The QR code will be assigned by ECDB at the same time as the CID of the crew member. It is up to the Member States to determine how technically to insert the QR code in the documents.

## **2.30 Breach, infringement, suspension**

**What are the possibilities for reporting potential breaches in the transposition of other Member States to the Commission? If, for example, it is found that certificates have been given in a way that is too generous or if there is discrimination against boatmen.**

In general, the Commission identifies possible infringements of EU law on the basis of its own investigations or following complaints from citizens, businesses or other interested parties. The Commission can launch a formal infringement procedure when the EU country concerned does not remedy the alleged breach of EU law. In addition, as regards the issuing of the documents referred to in Article 10 (2) or (3) of the Directive, if the Commission establishes that it is no longer subject to requirements identical to those laid down in the Directive, it shall adopt implementing acts suspending the validity on all Union inland waterways of certificates of qualification, service record books and logbooks issued in accordance with those requirements.

## 2.31 Lists and codes for data exchange with ECDB and their integration into the ERDMS

What are the ERDMS lists and codes that are covered for the data exchange in the ECDB?

(see document CESNI/QP (21) 61 rev. 1)

1. Type of documents
2. Types of qualification
3. Specific authorisations
4. Notified stretches with specific risks
5. Competent authorities
6. Countries
7. Fitness related mitigation measures and restrictions.

Which methodology can be applied for the application of serial numbers?

(see document CESNI/QP (21) 61 rev. 1)

1. Person X with (8 digits) CID=87654321 receives their first EU boatmaster certificate from the Dutch competent authority number 1. The certificate will be attributed the **21 digits serial number** 87654321**QEU01NL010001** (CID+**codetypedoc**+codequa+**codeissuer**+ four digits specific number which is incremental and based on the type of certificate for that holder<sup>1</sup>).
2. Later, the same person receives his second boatmaster certificate from the Austrian competent authority number 2. The certificate will be attributed the **21 digits serial number** 87654320**QEU01AT020002**.
3. At the same time, that person is issued its first radar certificate from the same Austrian competent authority. The specific authorisation will be attributed the **18 digits serial number** 87654321**SPRAT02001**. (CID+**codetypedoc**+codeAuthType+**codeissuer**+ three digits specific number which is incremental and based on all specific authorisations for that holder).
4. In case that person gets from Hungarian issuing authority n°2 an authorisation to sail on a stretch with specific risks for the first time (on the Danube or somewhere else), that authorisation will be attributed the 18 digits serial number 87654321**SPSHU02001**.
5. In case that person gets from Romanian issuing authority n°3 a second authorisation to sail on another stretch with specific risks, that authorisation will be attributed the **18 digits serial number** 87654321**SPSRO03002**.

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<sup>1</sup> One possibility is that the number "0000" is reserved for database version of the document independently from his issuing authority and/or subtype. This version of the document would always be "0000" (or blank/void) and the different issued hardcopies/pdf versions of this document will be incremental e.g.; "0001", "0002" etc.

6. Person Y with CID=12345678 receives his second RH boatmaster certificate from German competent authority n°3. The certificate will be attributed the 21 digits serial number 12345678QRH50DE030002.
7. The same person Y will receive his LNG certificate from the same authority. The certificate will be attributed the 21 digits serial number 12345678QRH50DE030001.
8. The same person Y will receive his first SRB from Dutch authority n°1. The SRB will be attributed the **21 digits number** 12345678**SRBRHNL010587** (CID+**code doc**+issuer+ **four digits incremental number** of SRB issued by that authority).

For additional explanations see next pages.



S. No.	List	ERDMS encoding required	Title of table in the ERDMS	Lists, codes or coding method as relevant	Comments																																	
1	Types of documents	YES Regulation (EU) 2020/182 (Annex I)	CODE-TYPE-DOC	<table><thead><tr><th>code</th><th>Name</th><th>Sort-of</th></tr></thead><tbody><tr><td>Q--</td><td>Certificate of Qualification</td><td></td></tr><tr><td>SRB--</td><td>Service Record Book</td><td></td></tr><tr><td>LBK--</td><td>Logbook</td><td></td></tr><tr><td>QEU</td><td>Certificate of Qualification of the EU</td><td>(Q--)</td></tr><tr><td>QRH</td><td>Certificate of Qualification of the CCNR</td><td>(Q--)</td></tr><tr><td>SP</td><td>Specific Authorizations</td><td>(SP)</td></tr><tr><td>SRBEU</td><td>Service Record Book of the EU</td><td>(SRB--)</td></tr><tr><td>SRBRH</td><td>Service Record Book of the CCNR</td><td>(SRB--)</td></tr><tr><td>LBKEU</td><td>Logbook of the EU</td><td>(LBK--)</td></tr><tr><td>LBKRH</td><td>Logbook of the CCNR</td><td>(LBK--)</td></tr></tbody></table> <p>Documents of the same type are described by the same number of letters. Q--, SRB-- and LBK-- are proposed for possible use, for national certificates outside the ECDB or for third countries documents. In these cases, two hyphens replace the “EU” or “RH” so that the code for the type of doc include the same number of digits;</p>	code	Name	Sort-of	Q--	Certificate of Qualification		SRB--	Service Record Book		LBK--	Logbook		QEU	Certificate of Qualification of the EU	(Q--)	QRH	Certificate of Qualification of the CCNR	(Q--)	SP	Specific Authorizations	(SP)	SRBEU	Service Record Book of the EU	(SRB--)	SRBRH	Service Record Book of the CCNR	(SRB--)	LBKEU	Logbook of the EU	(LBK--)	LBKRH	Logbook of the CCNR	(LBK--)	Code as it will be used in the serial number (see examples below). It will follow the CID (except for LBK).
code	Name	Sort-of																																				
Q--	Certificate of Qualification																																					
SRB--	Service Record Book																																					
LBK--	Logbook																																					
QEU	Certificate of Qualification of the EU	(Q--)																																				
QRH	Certificate of Qualification of the CCNR	(Q--)																																				
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2	Types of qualification	YES Regulation (EU) 2020/182 (Annex I) complement to type of docs to be more specific	CODE-CERT-TYPE	<p>Code qualification: 2 digits number.</p> <table><thead><tr><th>Code</th><th>name</th></tr></thead><tbody><tr><td>01</td><td>Boatmaster</td></tr><tr><td>02</td><td>Helmsman</td></tr><tr><td>03</td><td>Able Boatman</td></tr><tr><td>04</td><td>Boatman</td></tr><tr><td>05</td><td>Deckhand</td></tr><tr><td>06</td><td>Apprentice</td></tr><tr><td>50</td><td>LNG Expert</td></tr><tr><td>51</td><td>Passenger Navigation Expert</td></tr></tbody></table>	Code	name	01	Boatmaster	02	Helmsman	03	Able Boatman	04	Boatman	05	Deckhand	06	Apprentice	50	LNG Expert	51	Passenger Navigation Expert	These codes will be used in the serial number of the certificates of qualification following type of doc code (see examples below) based on the list of code_crew_role. Where possible they are based on the codes defined for roles/functions under Regulation (EU) 2020/182 to fill in SRBs and LBKs. This also the reason why 07, 08, 09 and immediate followers have not been used as these codes could be used for national registers and/or future applications of ECDB.															
Code	name																																					
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02	Helmsman																																					
03	Able Boatman																																					
04	Boatman																																					
05	Deckhand																																					
06	Apprentice																																					
50	LNG Expert																																					
51	Passenger Navigation Expert																																					

3	Types of specific authorisations	YES Regulation 2020/182 (Annex I)	CODE-AUTH-TYPE	<table><tr><th>code</th><th>name</th></tr><tr><td>R</td><td>for sailing with the aid of radar</td></tr><tr><td>M</td><td>for sailing on inland waterways with a maritime character</td></tr><tr><td>C</td><td>for sailing large convoys</td></tr><tr><td>S</td><td>for stretches with specific risks</td></tr></table> <p>“R”, “M”, “C” are the codes specified in Regulation 2020/182</p>	code	name	R	for sailing with the aid of radar	M	for sailing on inland waterways with a maritime character	C	for sailing large convoys	S	for stretches with specific risks	These codes will be used in the serial number for specific authorisations following type of doc code (see examples below)
code	name														
R	for sailing with the aid of radar														
M	for sailing on inland waterways with a maritime character														
C	for sailing large convoys														
S	for stretches with specific risks														
4	Stretches of inland waterways with specific risks	YES Regulation (EU) 2020/182 (Annex I)	LIST-STRETCH	Combination of an inland waterway code (3 letters), the starting river km point (4 digits number) and the ending river km point of the stretch (4 digits number), separately by a single dash “-“. Example: RH-0498-0592 for the Rhine, or D--2249-2322 for the Danube. The list of inland waterway codes will be established by the Commission. It will use the codes for inland waterways listed in Section 2A of Implementing Regulation 2018/1973 when three digits and complement the two or one digits codes with respectively “-“ or “--“. The km points of the notified stretches will also be attributed by the Commission on the basis of the information communicated by the Member States.	These codes will NOT be used in the serial number for specific authorisations but on the certificates and in the registers/ECDB to designate the stretches of inland waterway with specific risks for which specific authorisations have been granted. Authorisation can be granted for sub-section of these notified stretches of inland waterways eg RH-0500-0530. In that case, the sub-section will have to be entered manually in the registers (free text field) as not available as such in the list of notified stretches of specific risks. The same methodology should however be followed to encode the stretch.										
5	Competent authorities	YES Regulation (EU) 2020/182 (Annex I)	CODE-ACTOR	The competent authority code is composed of two letters (country) and a 2-digit alphanumerical code. For example, AT01, AT02 and AT03 are three codes for Austria which code-actor value respectively 01, 02 and 03. A code-actor is unique for each pair ACTOR-ID/country-ID, but the same code must be used for all authorization-ID of such a pair. This code can be used to designate a competent authority designated to issue certificates of qualifications in the context of a country. For example, AT01 could be “Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology” and the same code should be used in the context of issuing certificates and issuing service record books if “Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology” has been attributed these two competences.	This table contains the official name of the competent authority, in the national language and English, together with its code.										

6	Countries	Necessary for authorities coding	CODE-COUNTRY	For real countries, we use the 2-letter ISO 3166 country code. If needed we can use EU for European Union, and RH for CCNR because both EU and RH are not used in ISO-3166.																					
7	Limitations	YES Delegated directive 2020/12	CODE-CERT-LIMITATIONS	<table><tr><th>code</th><th>name</th></tr><tr><td>01</td><td>Sight correction (glasses or contact lenses, or both) required</td></tr><tr><td>02</td><td>Hearing aid required</td></tr><tr><td>03</td><td>Limb prosthesis required</td></tr><tr><td>04</td><td>No solo duty in the steering house</td></tr><tr><td>05</td><td>Only during daylight</td></tr><tr><td>06</td><td>No navigational duties allowed</td></tr><tr><td>07</td><td>Limited to one craft, named ...</td></tr><tr><td>08</td><td>Limited area, namely ...</td></tr><tr><td>09</td><td>Limited task, namely ...</td></tr></table>	code	name	01	Sight correction (glasses or contact lenses, or both) required	02	Hearing aid required	03	Limb prosthesis required	04	No solo duty in the steering house	05	Only during daylight	06	No navigational duties allowed	07	Limited to one craft, named ...	08	Limited area, namely ...	09	Limited task, namely ...	
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8	Status of Certificate	Coding not required but list of statuses established by Regulation 2020/473 and to be included in ERDMS.	LIST_CERT_STATUS	<table><tr><th>code</th><th>name</th></tr><tr><td>1</td><td>Active</td></tr><tr><td>10</td><td>Expired</td></tr><tr><td>11</td><td>Suspended</td></tr><tr><td>12</td><td>Withdrawn</td></tr><tr><td>90</td><td>Lost</td></tr><tr><td>91</td><td>Stolen</td></tr><tr><td>92</td><td>Destroyed</td></tr></table>	code	name	1	Active	10	Expired	11	Suspended	12	Withdrawn	90	Lost	91	Stolen	92	Destroyed	At this stage, the possible codes indicated here are for illustration only				
code	name																								
1	Active																								
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