

PROPOSALS OF AMENDMENTS TO DIRECTIVE 2006/87/EC (for Italian lakes and rivers – zones 3 and 4)

Subject	Ref. of article	Requirement of Directive 2006/87/EC	Proposals of amendments
Vessels'hulls	Annex.2 Part II Chapt.15 art.15.02.1 a	Thickness of the outside plating of steel vessels'hulls	The annex II doesn't give any requirements for the construction of passengers' vessels with FRP or wood (fuel material) Neverthelsss such a construction typology (hulls constructed with fuel materials), is widely used by middle sized shipyards, for sea navigations too. It's proposed, by the way, that the strength of vessel's hull should comply with the rules of approved Classification societies
Intact stability	Annex.2 Part II Chapt.15 art.15.03.3 f	For a heeling moment resulting from moments due to passengers, wind and turning according to paragraphs 4,5 and 6, the residual freeboard shall be not less than 200 mm	The residual freeboard should be more than 200 mm for a heeling moment resulting from the sum of of the 2 heavier among the moments due to passengers, wind and turning It has to be pointed that such requirement is penalizing compared to the sea navigation ones
Intact stability	Annex.2 Part II Chapt.15 art.15.03.3 g	Residual safety clearance shall be at least 100 mm on the application of the three heeling moments resulting from subparagraph (f)	Residual safety clearance shall be at least 100 mm for a heeling moment resulting from the sum of of the 2 heavier among the moments due to passengers, wind and turning It has to be pointed out that such requirement is penalizing compared to the sea navigation ones
Damaged stability	Annex.2 Part II Chapt.15 from art.15.03.7 to art 15.03.13	Requirements to prove the damaged stability	A derogation from article 15.03.par.9 (damaged stability) it's requested for passenger vessels not exceeding 25 m in length and authorised to carry up to a maximum of 150 passengers, provided that shall be proven the following points: a) Vessel that is not classified as "high speed vessel" b) Vessel cruising within one hour from safe anchorage or harbor
Propulsion system Sistema di propulsione	Annex.2 Part II Chapt.15 art.15.07	Vessels shall be equipped with a second independent	Inland navigation has done not far away from the coast, with a short duration and in tranquil water. That's why a second independent propulsion system it's not

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		propulsion system	necessary
Second drive unit	Annex.2 Part II Chapt.6 art.6.02.1	Time to bring into use a second independent drive unit	According to art.6.02, it shall be possible to bring a second independent drive unit, or manual drive, into use within five seconds if the steering apparatus drive unit fails or malfunctions A derogation from this article is requested, in such a way that it comes into use in time to guarantee the safety navigation
Muster areas	Annex.2 Part II Chapt.15 art.15.06.08 b) and art. 15.06.08 k)	Passengers muster areas	For passenger vessels not exceeding 25 m in length and authorised to carry up to a maximum of 150 passengers, in accordance with the vessel's dimensions the prescribed requirement of art.15.06.08 b) (each individual muster or evacuation area shall be larger than 10 mq and in any case the total area shall be calculated by assuming at least 50 % of the maximum permitted n. of passengers) can't be apply. It's proposed to consider as muster areas, the uncovered bow and stern areas, provided that they will be equipped with handrail, exit lattice gates on both sides, and 2 exit doors in the passengers' cabin
Oily water and used oil drainage system No derogation is requested (see latest column at right)	Annex.2 Part II Chapt.8 art.8.08.09	Drainage system and pipe equipped with closing device that have been sealed in position by an inspection body.	The inspection body controls for the oily water pumping out operations could create more difficulties during the vessel's service operations A derogation is requested, in such a way that the captain can be allowed for proceeding in oily water pumping out operations only in authorized docks' stations. This provided that a logbook for registering all the operations done (numbers and quantities) shall be held It's proposed to use the keys instead of splice. In such a way you don't need any inspection body involvement, and therefore no derogations to be asked for. The oily water will be stored in specially provided hold (it may be OK also the engine room bilge) and pumped out in authorized docks' stations. This provided that a logbook for registering all the operations (numbers and quantities) shall be held
Ship's boat	Annex.2 Part II Chapt.10 art.10.04	Ship's boat equipment	Unworkable and exorbitant requirement, also considering the vessels's sizes and the total passengers carried up. That's why a derogation is requested In case of a good vessel's handiness, equipped with a camera in stern position, cruising within short distance from the coast, a derogation is requested, in order to not foresee such a ship's boat.

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Life – saving equipment	Annex.2 Part II Chapt.15 art.15.09.5	Number and typologies of life-saving equipment	For inland navigation the following criterias for determining the consistency of life-saving equipment is requested: • Passenger vessels not exceeding 25 m in length and authorised to carry up to a maximum of 150 passengers: individual life jackets for every passengers • Passenger vessels exceeding 25 m in length and authorised to carry up more than 150 passengers: life-rafts sufficient for all passengers If the vessel cruises within 30' from the coast the life-saving equipment requested could be as follows: individual life jackets + 3 lifebuoys at least
Fire protection	Annex.2 Part II Chapt.15 art.15.11	Fire protection of materials and components	The fire protection of materials and component as per art. 15.11, concerns hulls made of steel or of another equivalent material (in terms of fire resistance) It has not been foreseen any clear requirements for combustible materials (fiberglass or wood hulls). Nevertheless there are a large number of small-middle sized passengers'vessels in inland waterways short range cruising A derogation is requested, referring to the rules in force and adopted by the approved Classification societies, whose technical requirements have been always used for sea and inland navigations passengers 's vessels.

May 31 / 2010

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