
Comments on proposed amendments in document CEVNI EG/2019/2

Transmitted by Austria

I. Introduction

The Austrian Ministry of Transport, Innovation and Technology is supporting the alignment of CEVNI and the Rhine Police Regulations. Experience shows that almost no boatmaster is able to list the differences between CEVNI and RPR. Reducing the differences would therefore contribute to the safety of navigation.

II. Amendment to article 1.02

Austria supports the proposed amendment. The text in square brackets should be deleted. Even if there are more boatmasters on a vessel than those required by regulations, only the boatmaster under whose authority the vessel is placed must have a certificate for the respective sector. The reference to RPR or a resolution of UNECE would restrict the applicability of the paragraph to the boatmasters required by a regulation. We would therefore invite CCNR to consider deleting the text in square brackets in the RPR.

III. Amendments to Article 1.07

Austria supports the proposed amendment. The text in square brackets should be kept. An additional reference to resolution No. 61 could be added.

IV. Amendments to Article 1.08

Paragraph 4:

According to the transitional provisions in Article 33.02 ES-TRIN, Article 13.08 paragraph 2 of ES-TRIN has only to be applied at the first renewal of the certificate after 30.12.2024 on vessels in service on waterways other than the river Rhine. The date of application on the river Rhine was 2010. It is therefore too early to apply this regulation on waterways outside the Rhine.

In addition, article 13.08 (2) of ES-TRIN does not forbid inflatable life jackets for children. It is only allowing non-inflatable life jackets in addition to the inflatable life jackets for children. CCNR is therefore invited to consider an alignment of the RPR with ES-TRIN.

Paragraph 5:

Article 33.02 of ES-TRIN contains an unlimited transitional provision for article 14.02 (4) of ES-TRIN. But the proposed text of paragraph 5 is not introducing a requirement to equip existing vessels with guard rails. It is only introducing rules for the use of guard rails that are required. The proposal is therefore supported by Austria.

Paragraph 6:

The proposal is supported in principle by Austria, but the reference to ES-TRIN in square brackets should be deleted, because of the transitional provision in article 33.02 ES-TRIN for article 13.08 (2) of ES-TRIN.

In (a) “no risk” has to be replaced by “a risk”.

In addition, Austria would like to draw the attention to the fact that sun bathing on the deck of most pleasure craft would no longer be allowed (respectively would only be allowed with life jackets) according to this paragraph because most pleasure craft do not have guard rails with a height of 950 mm on the deck. We propose to add to (d):

“On pleasure craft this is only applicable during operations.”. CCNR is invited to consider the same amendment for the RPR.

V. Amendments to Article 1.10 (1)/9.02(6)

Austria supports the proposed amendment. The text in square brackets should be kept. An additional reference to resolution No. 61 could be added.

VI. Amendments to Article 10.07

Austria supports the proposed amendment. The text in square brackets should be kept. An additional reference to resolution No. 61 could be added.

VII. Amendments to Article 7.01

Austria supports the proposed amendment. The text in square brackets should be kept. An additional reference to resolution No. 61 could be added.
