



Galerie Agora,
Rue du Marché aux Herbes 105, Bte 11
B-1000 Brussels
Telephone +32 2 285 46 60
Fax +32 2 280 08 17
Email: etf@etf-europe.org
www.etf-europe.org

European Transport Workers' Federation
Fédération Européenne des Travailleurs des Transports
Europäische Transportarbeiter-Föderation
Federación Europea de los Trabajadores del Transporte

CESNI

Proposals for the Work Programme 2019-2021

ETF is pleased to learn that most of its proposals for the future work of CESNI fit into the strategic guidelines proposed by DG MOVE and the Secretariat of the CCNR and endorsed by CESNI during its meeting on 10 April. ETF has tabled input for three fields after Secretary General Georges' call to provide input for the future work programme during the CESNI meeting in October 2017.

ETF has been particularly pleased to be able to explain its concerns also in direct contact and bilateral exchange with the CCNR Secretariat and with other stakeholders in the process of collecting input to continue CESNI work which proved to be very effective when dealing with mandatory standards foreseen in the new directive on professional qualification.

The work carried out by CESNI so far is a good start for more attention to quality education and training in Europe. It will however not be sufficient to allow quality work and safety conditions in European inland waterway transport and above all it should be completed with manifold activities on CESNI level to provide technical standards that guarantee a level playing field for attractive jobs in the inland waterway sector.

Answering a request from CESNI presidency and CESNI member states, ETF is submitting its proposals for the future work programme of CESNI with a view to categories defined by the strategic guidelines, a problem description which explains why action is required to maintain or improve safety, fair working condition and attractiveness of the sector.

1. Training & education

a. Development of a permanent quality controlling instrument

Strategic Guideline A) "Define requirements for a monitoring system for quality management, in particular with respect to the competence standards"

The QP Directive foresees approved training programmes which will be installed all over Europe and beyond. To guarantee a level playing field and to keep a sufficient level of safety, international requirements - to verify if education and training meets the minimum requirements in terms of curricula content, expertise and training level of trainers and equipment - should be established.



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b. Development of periodic training, retraining & education linked to the validity of the certificate – this for all functions

Strategic Guideline A) “Define requirements for a monitoring system for quality management, in particular with respect to the competence standards”

Currently, refresher classes are only mandatory for LNG and passenger navigation experts. Like in road transport, where co-legislators just finalized work on a new directive amending directives 2003/59/EC and 2006/126/EC with a view to a zero accident strategy and the Paris Climate agreement general qualifications starting with management level should undergo regular refreshment of safety training and eco-navigation (see also Strategic Guideline on the development of an approach for environment-friendly and efficient navigation).

IWT should not fall behind in external costs with a view to accident and smart shipping as competitors in road transport move ahead in terms of continued learning and reducing accidents and pollution. CESNI is the only platform which could at least define basic requirements for such training at European level.

c. Development of legal framework for apprentices – structural accompanying programmes for apprentices – standards for trainers & apprenticeships

Strategic Guideline A) “Define requirements for a monitoring system for quality management, in particular with respect to the competence standards”

To protect mostly minors or very young adults, starting a competence based career in inland waterway transport, apprentices should be adequately protected on board. They should also have to undergo a basic safety training such as deckhands have to according to the QP Directive with a view to all types of vessels they will be sailing on during their apprenticeship. Minimum working conditions and adequate guidance from experienced trainers or professors which apart from their pedagogic skills should have minimum competence to survey and follow apprentices and prevent them from prematurely quitting their career should be laid down in European standards.

d. Development practical exams for all functions

Strategic Guideline A) “Define requirements for a monitoring system for quality management, in particular with respect to the competence standards”

The QP-Directive omitted to establish a practical exam for operational level which is currently required by manning requirements at national and international level all over Europe. CESNI should propose standards when discussing a future legal



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instrument on manning or as non-binding standard to keep the current practice of practical examination and to avoid certificate shopping to countries where no practical examination at operational level is foreseen.

CESNI could also consider if a practical examination on board a vessel or a simulator could be introduced for inland waterways with a maritime character or for stretches with specific risks in order to foster labour mobility and guarantee a sufficient level of safety.

e. Development & implementation simulator training

Strategic Guideline A) “Develop standards for the use of modern training tools such as simulators used for training and assessment and development of e-learning tools”

As in all other modes of transport, simulators are used in training and so also inland navigation should meet technical minimum requirements and time spent on simulators should be taken into consideration as experience time as long as a minimum of real life sailing time experience is reached.

f. Establishment platform permanent monitoring & aligning training & education to technological & digital evolutions in close cooperation with Edinna

Strategic Guideline A) “Develop standards for the use of modern training tools such as simulators used for training and assessment and development of e-learning tools”

Many projects funded at EU or national level propose e-learning solutions for inland waterway transport. There should be an inventory of available projects and criteria to be met to integrate e-learning in curricula for professional training and continued training.

g. Finalising River speak¹

Strategic Guideline A) “Further definition of “standardised communication phrases”

Even though elementary English is currently only foreseen for the passenger navigation expert in the QP Directive, a lot of training for standardized phrases is

¹ More and more we learn that lack of communication is the direct cause of safety issues on board – this had to be remedied by means of River Speak and the inclusion of basic English language courses in all curricula



carried out in English language, especially for on-board communication which is vital to prevent accidents and to ensure good working conditions.

2. Crewing regulation (issues 2 and 3 relate to Strategic Guideline C)

a. Continued support to the TASCS project (Towards a Sustainable Crewing System) for the development of a sustainable manning tool

In early 2019, Social Partners will present the results of the TASCS study. A first analysis of the results should be carried out by a tripartite European conference of experts organized at CESNI level to include the expertise of CESNI PT and CESNI QP. A subsequent debate on technical standards redefining workloads should be open to other stakeholders like Aquapol and Edinna, of course.

b. Cooperate to the establishment of a European regulatory framework for crewing

Waterways and port authorities, law enforcement experts from the sector, social partners and researchers could use CESNI as a platform to discuss any workload and safety related standard in full transparency.

c. Establishment Platform for permanent monitoring & coordination on the correct application of the (future) manning regulation

Waterways and port authorities, law enforcement experts from the sector, social partners and researchers could use CESNI as a platform to discuss any legal instrument required to properly implement a revised manning regulation.

3. Social Security coordination

a. Cooperate to the establishment of uniform rules for the coordination of social security on European level and these rules have to be governed via tri-partite structure similar to CASS.

Based on the principle of one system for everyone working on the same vessel, uniform rules for the coordination of social security have to be developed. A principle that for the moment only applies to the Rhine and is challenged via case law.

The co-existence of two systems leads to legal uncertainty for many crewmembers in the area of long term rights such as pensions and it contributes to the creation of social dumping practices.



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CESNI needs to establish unique rules to identify the applicable legislation for all crewmembers working on board of the same vessel.

Once the rules/standards defined, the correct application should be permanently monitored & governed via a tri-partite structure similar to CASS.

ETF is committed to contribute to all activities with experienced experts such as members of exam commissions for practical and theoretical examination in various countries even from outside CESNI countries and CESNI observer countries. ETF can provide experience from the maritime sector where needed. ETF is prepared to continue its work at the level of temporary working groups, (ad-hoc) meetings of the permanent working group and at committee level.

Beyond the concrete actions for the future as mentioned above, ETF will be pleased to also assist and facilitate the implementation of CESNI standards as set out in part B) of the Strategic guidelines if need be.



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