



## ETF IWT Section

### Towards a new Crewing European Regulation

Today crewing is regulated per river basin whereby the Rhine Commission CCNR has elaborated an extensive Regulation for navigation personnel ([Central Commission for the Navigation of the Rhine - Crew and staff \(ccr-zkr.org\)](#)). The other river commissions (Danube, Moselle, Sava) implement the same regulatory stipulations.

As the present crewing regulation is well over 30 years old, in which ETF was not at all involved, time has come to prepare a solid European crewing regulation that will be applicable on the entire European interconnected waterway network.

CESNI (Comité Européen pour les Standards dans la Navigation Intérieure) established a solid basis for the future crewing regulation to be implemented simultaneously on a Pan-European level as non-EU Member States, participating in the ongoing negotiations commit to implement the new regulation.

Automation, new technologies, innovations, new fuels and propulsion systems have entered the sector. Whereas initially the sector changed very slowly, we note an acceleration due to the fact that the sector assumes its responsibility vis à vis climate change and wants to reduce its carbon foot print considerably and enhance its future as a sustainable transport mode ready to accept a bigger market share of transport volumes.

Within the ongoing negotiations absolute safety is the key cornerstone; especially as completely new models are explored that offer at the same time transparency and flexibility on the one hand, as well as on the other hand the elasticity to absorb new forms and levels of automation.

Time is of the essence, as a draft proposal of the future European Crewing Regulation has to be finalised by mid-2023 to be presented to the CESNI bodies in first reading. This procedure will be followed by a second reading producing the outcome that will be presented to the European Commission before the end of 2023. The European Commission remains in principle the only body that can develop legislative proposals at European level (the EU crewing Regulation).

In order to fully involve all working in the European IWT sector, **a first Consultation event has been set up on 14 December 2021** where concrete questions were put before the audience for consideration.

**On 14 December 2022 – another consultation event will be organised.** This will be an online event, where employees, employers, authorities, trade union representatives and other stake holders once again will be presented questions to consider in order to provide proper guidance to the negotiators.

A balanced participation is of the essence in order to proper weigh in on the various deliberations



at hand, and thus we urge the ETF Affiliates to start already now mustering their rank-and-file members to free themselves from work in order to participate online in the event.

On 24 October last, ETF urged the employers' organisations EBU and ESO, but more focussed on EBU, to write to their members to ensure that the employees are facilitated in getting time off to participate in the Consultation event. This was not the case last year, which resulted in ETF being under-represented.

What are the main items up for deliberations?

1. One Single crewmember operations

Although this is an exceptional situation needing the explicit authorisation from local authorities, it is more common than initially anticipated. What criteria should govern this kind of operation? What safety features must be on board to get this kind of authorisation?

2. Mandatory resting times

ETF proposes an 8h daily rest for all operating modes – also B1 (now 6h) – to counter fatigue & improve overall safety. Advice of the sector will be asked.

3. Mandatory resting days

ETF proposes minimum 4 mandatory resting days for all on board – also the owner operators – within the manning regulation in order to counter fatigue and improve overall safety. Advice of the sector will be asked.

4. Technical standards

Employers want more flexibility within the new EU manning regulation – and they want to know to what extent technical standards could support this. And what technical equipment could help facilitate flexibility within the crewing regulation.

5. Minimum crew during loading & unloading

Main question is whether the minimum crew has to be on board at all times. Or only when the vessel is sailing. At times the vessel only needs to move a little bit (unloading car or during verhalen/Verholen) can this be done by a reduced crew on board? The sector will be asked in which cases this could be allowed?

6. Operating modes

At present the operating modes are well known to all in the sector – respective 14, 18 or 24 working hours. Last year the sector expressed the will to keep these in the future crewing regulation. The question now is if an additional alternative could be offered, whereby the minimum crew would be defined based on the working times of the crewmembers. Danger here is that the employers link this alternative to the mandatory digital registration of working & resting times. All working with operating modes would therefore NOT have to register working & resting times.



## 7. Entry level

In the present manning regulation apprentices are part of the manning tables – this was done 30 years ago to stimulate training & education in the sector. Today however, there is a shortage of apprentices. The question that will be asked of the participants is if an able boatman can at all times be replaced by a deckhand and various variations of the same.

**Please, contact your rank-and-file members so that they can timely free themselves to participate in this Sector Consultation event.**

**An ETF preparatory meeting will be held with all registered participants on Tuesday 13th December at 9h30 – online.**