Construction materials

Transmitted by the European Barge Union (EBU), the European River-Sea-Transport Union (ERSTU) and the European Skippers Organization (ESU)

Introduction

1. Except where explicitly permitted in 9.3.x.0.3 or in the certificate of approval, the use of wood, aluminium alloys or plastic materials within the cargo area is prohibited. Exemptions are really necessary because the use of modern materials offers many advantages compared to steel, without affecting the level of safety.

2. In practice, it gives rise to frequent discussions between operators of inland vessels and the inspecting authorities. In many cases, modern materials are used although not in compliance with official conditions. The need for exemptions will continue to increase in the future as the use of steel should be avoided with a growing number of goods transported. In many cases, modern materials now guarantee a higher level of safety than steel.

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1 Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/WP.15/AC.2/2015/19.
3. No problems or safety-related events have been noted in those cases where exemptions to 9.3.x.0.3 are already permitted, allowing the use of wood, aluminium alloys or plastic materials.

**Current text**

4. 9.3.x.0.2 reads as follows:

“Except where explicitly permitted in 9.3.1.0.3 below or in the certificate of approval, the use of wood, aluminium alloys or plastic materials within the cargo area is prohibited.”

5. 9.3.x.0.3 reads as follows:

“(a) The use of wood, aluminium alloys or plastic materials within the cargo area is only permitted for:
   – gangways and external ladders;
   – movable items of equipment [(aluminium gauging rods are permitted, provided that they are fitted with brass feet or protected in another way to avoid sparking)]²;
   – chocking of cargo tanks which are independent of the vessel’s hull and chocking of installations and equipment;
   – masts and similar round timber;
   – engine parts;
   – parts of the electrical installation;
   – [loading and unloading appliances]³
   – lids of boxes which are placed on the deck.
(b) The use of wood or plastic materials within the cargo area is only permitted for:
   – supports and stops of any kind.
(c) The use of plastic materials or rubber within the cargo area is only permitted for:
   – [coating of cargo tanks and piping for loading and unloading:]⁴
   – all kinds of gaskets (e.g. for dome or hatch covers);
   – electric cables;
   – hose assemblies for loading and unloading;
   – insulation of cargo tanks and of piping for loading and unloading;
   – photo-optical copies of the certificate of approval according to 8.1.2.6 or 8.1.2.7.
(d) All permanently fitted materials in the accommodation or wheelhouse, with the exception of furniture, shall not readily ignite. They shall not evolve fumes or toxic gases in dangerous quantities, if involved in a fire.”

6. 9.3.x.0.4 reads as follows:

“The paint used in the cargo area shall not be liable to produce sparks in case of impact.”

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² The text within square brackets applies to 9.3.2.0.3 and 9.3.3.0.3, but not to 9.3.1.0.3.
³ The text within square brackets applies to 9.3.2.0.3 and 9.3.3.0.3, but not to 9.3.1.0.3.
⁴ The text within square brackets applies to 9.3.2.0.3 and 9.3.3.0.3, but not to 9.3.1.0.3.
7. 9.3.x.0.5 reads as follows:
“The use of plastic material for the vessel’s boats is permitted only if the material does not readily ignite.”

Proposal

8. 9.3.x.0.2 remains unchanged.
9. 9.3.x.0.3 is amended to read:
“(a) The use of wood or plastic materials within the cargo area is only permitted for:
– Gangways;
– Cleaning equipment, e.g., brooms;
– Supports and stops of any kind;
– Masts and similar round timber;
– Chocking of cargo tanks which are independent of the vessel’s hull and chocking of installations and equipment;

(b) The use of aluminium alloys or plastic materials within the cargo area is only permitted for:
– Gangways, external ladders and passageways;
– Fenders;
– Movable items of equipment such as extinguishers, gas detectors, rescue winches, etc.; aluminium gauging rods are permitted, provided that they are fitted with brass feet or protected in another way to avoid sparking;
– Insulation and coating of cargo tanks, piping for loading and unloading, gas discharge pipes and heating pipes;
– Masts and similar round timber;
– Engine parts;
– Protective covers of engines;
– Ventilators, including hose assemblies for ventilation;
– Parts of the water spray system and the eye and face bath;
– Parts of the electrical installation;
– Parts of the loading and unloading system, e.g., blocking valve, leakproof seals;
– The boxes, cabinets and containers on the deck for storage of spill disposal and recovery equipment and of fire-fighting appliances, fire hoses, waste, etc.;

(c) The use of plastic materials or rubber within the cargo area is only permitted for:
– All kinds of gaskets (e.g. for dome or hatch covers);
– Lines for electrical installations;
– Hose assemblies for loading and unloading;
– Fire hoses, hoses for cleaning the deck, spill equipment, sampling equipment and bottles, etc.;
– The mat under hose assemblies for loading and unloading;
– Mooring ropes;
– The photo-optical copies of the certificate of approval according to 8.1.2.6 or 8.1.2.7.

(d) All permanently fitted materials in the accommodation or wheelhouse, with the exception of furniture, shall not readily ignite. They shall not evolve fumes or toxic gases in dangerous quantities, if involved in a fire."

10. 9.3.x.0.4 remains unchanged.

11. 9.3.x.0.5 is amended to read:

“The use of plastic material for the vessel’s boats or of aluminium alloys for passageways within the cargo area is permitted only if the material does not readily ignite. Rubber mats must be made from an insulating material.”

Justification

12. In the cases presented by EBU, ERSTU and ESU, the modern materials do not involve any reduction in safety from a technical perspective. The new wording of the provisions considerably reduces the number of specific provisions. The provisions are also clearer for all concerned.