Loading Software

Transmitted by the European Barge Union

1. The European Barge Union (EBU) argued in its document INF.4 for a transition provision for equipping tank barges with certified loading computer software. In EBU’s argumentation the most important point is that the Recommended ADN Classification Societies so far missed to develop uniform interpretations and evaluations of a substantial number of technical issues which may influence the stability of tank barges.

2. The Recommended ADN Classification Societies have given the long-awaited interpretations and evaluations in their document INF.30, dated 22 January 2015. EBU is not willing to comment on this broadly. But the presented document affirms that there was a vital need for such a common approach by the Classification Societies. EBU regrets that this information could not have been delivered years ago.

3. In the short period between the publication of the document and today it has not yet been possible to review and evaluate all the statements of the Classification Societies given upon the so far unanswered questions. Given all respect towards the expert knowledge of the Classification Societies it is essential to deal with the new information – as well as for the tank barge industry and for the software manufacturers.

4. Given that all existing open questions are clarified right now the certification process will take its time. According to recently received information EBU assumes that the time needed to adapt and certify a programme for a single vessel will amount to approximately one week – if all necessary technical information and drawings for the vessel are available. EBU has indicated that 750 vessels have to be equipped with the new loading software. These circumstances are leading to the result that the approval process will take a duration of a minimum 4.8 years

5. The now available common perceptions of the Classification Societies may in many cases lead to technical adaptations of the tank barges. The most suitable way for these adaptations to be done is during a Classification renewal process.

6. These considerations are fully in line with EBU’s proposal for a transition period indicated in document INF.4.
7. EBU has proposed in its document INF.4 the following transition period:

"Paragraph 9.3.2.13.3 may be applied until the renewal of the certificate of approval applicable on 31 December 2012."

8. EBU enlarges this proposal to Type N and Type G vessels as follows:

"Paragraphs 9.3.1.13.3, 9.3.2.13.3 and 9.3.3.13.3 may be applied until the renewal of the certificate of approval applicable on 31 December 2012."