Proof of sufficient intact stability

Drafting of stability booklets and stability programmes

Transmitted jointly by the European Barge Union (EBU), the European River Sea Transport Union (ERSTU) and the European Skippers Organization (ESO)\(^1\),\(^2\)

1. ADN, in subsections 9.3.1.13.3, 9.3.2.13.3 and 9.3.3.13.3, contains the requirements for stability booklets and loading calculators.

2. By derogation from ADN section 1.16.1.3, provisional certificates of approval could be issued once for a period of six months in 2015, or may be issued for a period of four months in subsequent years, so that proof of intact stability in accordance with 9.3.1.13.3, 9.3.2.13.3 and 9.3.3.13.3 can be submitted for renewal of the certificate of approval.

These provisions appear in multilateral agreements M 014 and M 015, with validity until 31 December 2019.

\(^1\) Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/AC.2/2016/40.

\(^2\) In accordance with the draft programme of work of the Inland Transport Committee for 2016-2017 (ECE/TRANS/2016/28/Add.1 (9.3)).
3. Despite the fact that intensive negotiations and in-depth discussions were held when these agreements were being drawn up, the time required for the drafting of stability booklets and stability programmes was seriously underestimated.

4. For this reason, the European inland navigation industry requests that, when certificates of approval are up for renewal, for both 2016 and all subsequent years, the time frames mentioned in multilateral agreements M 014 and M 015 for the single issuance of provisional certificates of approval should be changed to **six months** for the submission of proof of intact stability in accordance with ADN 9.3.1.13.3, 9.3.2.13.3 and 9.3.3.13.3.