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Working Party on the Standardization of Technical and Safety Requirements in Inland Navigation

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Item 8 (c) of the provisional agenda

Establishment of common principles and technical requirements for pan-European River Information Services (RIS): International Standard for Tracking and Tracing on Inland Waterways (VTT) (Resolution No. 63)

Draft revised International Standard for Tracking and Tracing on Inland Waterways (VTT) (Resolution No. 63)

**Transmitted by Russian Federation, Slovakia, Switzerland, Central
Commission for the Navigation of the Rhine and the Chair of the VTT
Expert Group¹**

I. Mandate

1. At its forty-second session, the Working Party on the Standardization of Technical and Safety Requirements in Inland Navigation (SC.3/WP.3) took note of the amendment proposals to International Standard for Tracking and Tracing on Inland Waterways (VTT) (Resolution No. 63) transmitted by the Chair of the VTT Expert Group (VTT EG). The Working Party invited the Chair to provide a brief explanatory text on the main changes to be introduced into the VTT Standard to facilitate commenting on the text. It also requested the secretariat to include in its questionnaire for the forty-third session of SC.3/WP.3, an

¹ This document is submitted in line with the output/activities of cluster 2:6: Inland water transport, para. 1B(h) of the work plan 2012–2016 (ECE/TRANS/2012/12) adopted by the Inland Transport Committee on 1 March 2012 (ECE/TRANS/224, para. 94). Para. 1B(h) provides a mandate for maintenance of resolutions on common principles and technical requirements for a Pan-European River Information Service, such as Resolution No. 63.

invitation to Governments and River Commissions to comment on the proposed draft text of the Standard (ECE/TRANS/SC.3/WP.3/84, paras. 50–53).

2. At its forty-third session the Working Party considered the draft revised VVT standard, prepared by the secretariat (ECE/TRANS/SC.3/WP.3/2013/14) and exchanged views on the proposals submitted by the Central Commission for the Navigation of the Rhine (CCNR) and the Russian Federation in informal documents SC.3/WP.3 Nos. 9 and 16 (2013). In doing so, the Working Party recognized that it would be more appropriate to include the additional information in section 2.4.2.1 and chapter 3 of document ECE/TRANS/SC.3/

WP.3/2013/14 in separate technical clarifications, referenced in Resolution No. 63, as they did not constitute technical prescriptions (ECE/TRANS/SC.3/WP.3/86, paras. 37–40).

3. The present document consolidates the comments on the revision of the VTT Standard received from the delegations, as well as the explanatory text submitted by the chair of the VTT Exert Group into a single document. An updated amendment proposal on Resolution No. 63 is contained in the addendum to this document.

4. The Working Party may wish to consider the updated amendment proposal with due regard to the positions expressed by the delegations and issue further instructions to the secretariat on preparing the final proposal for the fifty-eighth session of the Working Party on Inland Water Transport.

II. Comments on the revision of the International Standard for Tracking and Tracing on Inland Waterways (VTT) (Resolution No. 63)

A. Russian Federation

5. The Russian Federation would like to draw attention to the inconsistencies contained in document ECE/TRANS/SC.3/WP.3/2013/5² regarding the use of AIS Class B (CS) stations on inland waterways.

6. In the section 2.3.4, Technology platform, the use of AIS Class B (CS) stations is declared impossible. In chapter 3, AIS Class B mobile station on inland waterways, the term «AIS Class B» is used and reference is made to the associated IEC 62287 Standard, which also includes AIS Class B (CS) stations.

7. In order to rectify these inconsistencies, the Russian Federation proposes adding the following paragraph to para. 3.1 of chapter 3 (source: ECE/TRANS/SC.3/2012/9):

The use of AIS Class B (CS) stations should be restricted to recreational craft. Particular vessel types of a certain length, such as tugboats and service vessels, should be authorized to use AIS Class B SO transponders. The competent national authorities must ensure the control and integrity of the AIS VHF data link.

² Document ECE/TRANS/SC.3/WP.3/2013/5 is an earlier version of ECE/TRANS/SC.3/WP.3/2013/14 and the provisions referred to by the Russian Federation are identical in substance in both documents.

B. Slovakia

8. Draft section 2.3.2.1 states that the ERI code (i.e. code as standard for electronic ship reporting) is used that for the designation of the type of vessel or convoy (for inland waterway vessels). However, the standard (technical specifications) for ERI does not use the code to distinguish types of vessels or convoys, but relies on the UN Recommendation 28, which is managed and published by UNECE.³ For this reason, Slovakia proposes to refer to the UN code instead of ERI code.

9. In table 2.15 on Water Level report:

(a) Parameter “UN country code” in the sixth line: the description refers to “UN country code using 2*6-bit ASCII characters according to ERI specification”. ERI specifications do not define the ERI own country codes but rely on the UN Recommendation 3⁴ (also ISO Standard 3166-1). For this reason, Slovakia proposes to refer to “UN Recommendation 3” or “ISO 3166-1” instead “ERI specification”;

(b) Parameter “Gauge ID” in the seventh line: in the description (national identifiers gauging station) it is stated that it should be defined by ERI for each country. This implies that national identifier gauging stations should be established by ERI, which is not true, since they are determined by the competent national authorities. Therefore, Slovakia proposes to delete this text or replace it.

10. Slovakia agrees with proposal of Russian Federation to add the paragraph to para. 3.1 of chapter 3, as follows:

The use of AIS Class B(CS) stations should be restricted to recreational craft. Particular vessel types of a certain length, such as tugboats and service vessels, should be authorized to use AIS Class B SO transponders. The competent national authorities must ensure the control and integrity of the AIS VHF data link.

C. Switzerland and CCNR

11. The CCNR is currently working on the introduction of the obligation concerning the equipment and the use of inland AIS devices. The draft resolution, still under consideration, stipulates in its present version that all vessels should be equipped with inland AIS devices, except for the following vessels:

(a) Pushed convoys and side-by-side formations, except for vessels providing the main propulsion;

(b) Small craft, except for the vessels of the supervising authorities and vessels holding an inspection certificate in conformity with the Rhine Vessels Inspection Regulations or a certificate deemed to be equivalent in accordance with those Regulations;

(c) Pushed barges without their own means of propulsion.

12. As far as the small craft is concerned, the following provisions are foreseen:

Small craft employing AIS shall use only AIS devices in conformity with article 7.06, para. 3, of the Rhine Vessels Inspection Regulations; Class A AIS

³ The reference is made to UN/CEFACT Recommendation No. 28 on Codes for Types of Means of Transport (TRADE/CEFACT/2001/23) adopted in 2001.

⁴ The reference is made to UN/CEFACT Recommendation No. 3 on Code for the Representation of Names of Countries (ECE/TRADE/201) adopted in 1996.

devices having a type reception in accordance with the requirements of IMO, or Class B AIS devices. Class B AIS devices shall be in conformity with the corresponding requirements of recommendation ITU-RM.1371, of directive 1999/5/EC (on radio equipment and telecommunications terminal equipment) and of international standard IEC 62287 (including DSC channel management). AIS device shall be in good working order and the data entered in the Inland AIS device shall at all times correspond with the actual data relating to the vessel or the convoy.

13. In April 2013 CCNR adopted a revised version of the “Vessel Tracking and Tracing Standard for Inland Waterways”. When adopting it, CCNR did not consider it appropriate to include in the standard Chapter 3. In fact, para. 3.1 does not contain any prescriptive norm, which should be the goal of a standard. Furthermore, para. 3.2 implies obligations in terms of the equipment for certain types of vessels, which is beyond the scope of a VTT technical standard. This decision belongs to the regulating authorities and it cannot be influenced by this standard. As an example, small craft navigating on the Rhine and holding a Rhine inspection certificate must be equipped with inland AIS and not a Class B AIS Device. The reference to the recommendation of the International Telecommunication Union (ITU), the norm of the International Electrotechnical Commission (IEC) and the EU Directive should, indeed, be included in a standard. An alternative solution could be to include them in the draft Article 4.07 of CEVNI.

14. The section 2.4.2.1 on “Reference point for reported position and overall dimensions of vessel or convoy” had been deleted in the CCNR standard. CCNR believes this information is misplaced in the VTT Standard itself. CCNR intends to include this information in the CCNR Technical Clarifications on Vessel Tracking and Tracing Standard for Inland Navigation, edition 1.01 and Test Standard for Inland AIS, edition 1.0, which is due for revision so as to add test standard provisions relating to digital interface sentences.

15. As a member State of the CCNR, Switzerland fully supports the explanation communicated by the secretariat of the CCNR and will implement the CCNR decisions.

D. Chair of the VTT Expert Group

16. In the preparation of the draft revision of the VTT Standard for Inland Navigation the following main changes were made:

- (a) **References, page 7:** updating of the references used in the standards;
- (b) **Section 1:**
 - (i) Updating of the introduction (page 10);
 - (ii) Replacing “Ship/Combination” by “vessel and convoy”
- (c) **Section 2:**
 - (i) In section 2.2 a clarification is made regarding the reporting interval (page 28);
 - (ii) In section 2.3.1, technical guidelines on Inland AIS are introduced (page 28);
 - (iii) Entry “Loaded / unloaded vessel” is moved from section 2.3.2.1 (Static vessel information) to section 2.3.2.3 (Voyage related vessel information) (pages 29–30);
 - (iv) In section 2.3.2.4.1 (ETA at lock/bridge/terminal) clarification are made concerning air draught (page 30);

- (v) In section 2.3.3 (Reporting interval of information transmission) clarifications are made on mode on operation in Table 2.1 (page 32);
- (vi) In section 2.3.5 (Compatibility to IMO Class A transponder) clarifications are made regarding MKD and channel management (page 33);
- (vii) In section 2.3.9 (Type approval) a new section on type approval requirement is added (page 34);
- (viii) In section 2.4.1 (Message 1, 2, 3) amendments are made according to ITU-R M.1371-4 (page 35);
- (ix) In section 2.4.2 (Message 5), amendments are made according to ITU-R M.1371-4 (page 36) and footnote 2 on ATIS code is deleted. Call Sign is available and shall be used;
- (x) In section 2.4.2.1 a new figure on reference point for reported position is added (page 28);
- (xi) In section 2.4.3 (Message 23), amendments are made according to ITU-R M.1371-4 (page 38);
- (xii) In section 2.4.4.2 (Definition of inland specific message) clarification are made regarding:
 - Default values, e.g. ENI = 0 = ENI not assigned = default;
 - Ship/combination to vessel/convoy;
 - Draught.
- (xiii) In section 2.4.4.2.6 (Inland specific Message FI 24: Water level), in Table 2.15 on Water level report, clarifications re made on bit usage.
- (d) **Section 3:** a new chapter on AIS Class B is added (page 50);
- (e) **Annex D:** clarifications are made on interface sentences (page 59);
- (f) **Annex E:** clarifications are made on ERI sip type Catamaran fast (code 1920) (page 62).

17. As far as the process of updating the VTT Standard is concerned, the chair would like to highlight the following.

18. The update of the VTT Standard was initiated by the European Commission implementing EU regulation No. 689/2012. The VTT EG developed an updated version of the VTT standard and transmitted it to CCNR and UNECE. The draft updated standard covers all changes derived from the implementing EU regulation No. 689/2012 as well as further technical aspects such as updating the references to other standards, defining the reference point of reported position and introducing a new chapter regarding AIS Class A in inland waterways.

19. CCNR has updated its VTT standard and published the new edition of their VTT Standard in April 2013 (Vessel Tracking and Tracing Standard for Inland Waterways, Edition 1.2, 23 April 2013). The precondition of CCNR regarding the update of the VTT standard was that only amendments initiated by the implementing EU regulation No. 689/2012 were allowed. The goal was to achieve a maximum harmonisation between the EU version and the CCNR version of the VTT standard. The chapters regarding the definition of the reference point of reported position (proposed chapter 2.4.2.1) and the new chapter regarding AIS Class B in inland waterways (proposed chapter 3) were not introduced in the CCNR standard. Those new aspects should be carried over to the next revision of the VTT standard. In general, CCNR aims to maintain, as much as possible, the harmonization between the standards of EU, UNECE and CCNR.

20. The VTT EG will now develop a document collecting all change requests for the next revision of the VTT standard. At the last VTT EG meeting in November 2013 it was agreed that the issues mentioned above would be part of this document. UNECE may reconsider the introduction of chapter 2.4.2.1 and chapter 3 in order to maintain maximum harmonisation between the EU, UNECE and CCNR standards.

21. In response to the comments from the Governments, reproduced in this document, the chair's recommendations are as follows:

(a) Taking into account the discussions at the last SC.3/WP.3 session (ECE/TRANS/SC.3/WP.3/86, paras. 37–40), the chair agrees with the proposal to move the provision on the AIS Class B stations to the foreword. However, he advises not to go beyond the technical requirements for AIS Class B used in inland waterways only and, thus, to abstain from mentioning the possible applications of AIS Class B stations.⁵ The Chair also agrees with the proposal to delete chapter 2.4.2.1 dealing with the reference point of reported position.

(b) Comments by Russian Federation and Slovakia (paras. 5–7 and 10 of this document): The chair considers that there might be a slight misunderstanding in the proposal by the Russian Federation regarding the references to AIS Class B in the VTT standard. The amendment proposal refers to an inconsistency between Chapter 2.3.4 “Technology platform” and the new chapter 3 “AIS Class B mobile station on inland waterways“. The chair considers that there is no inconsistency because chapter 2 deals with the definition of Inland AIS station and new chapter 3 deals with the requirements for AIS Class B station. Chapter 2.3.4 states that AIS Class B CS is not a suitable technological platform for Inland AIS. Rather Inland AIS is technologically based on AIS Class A. In addition, as stated above, the chair considers that the possible applications of AIS Class B stations do not belong in the VTT standard. The VTT standard should only describe the technical requirements for AIS Class B used in inland waterways. The chair is of the opinion that it may be more appropriate to include the regulation on carriage requirement for all AIS stations in a regulatory document like CEVNI. For example, CCNR plans to include the carriage requirement for Inland AIS and the regulation on Class B in para. 4.07 of the Rhine Police regulations. The proposal from the Russian Federation regarding the regional use of AIS Class B could be covered in the CEVNI Chapter on the regional and national special requirements.

(c) Comments by Slovakia (paras. 8–9 of this document):

(i) The reference to ERI code in section 2.3.2.1: As far as the chair is aware, Recommendation 28 does not cover all code sub-divisions, e.g. “8 16 1 Tank barge, liquid cargo, type N” and “8 16 2 Tank barge, liquid cargo, type C”. If so, the reference to ERI code as stated in Annex E of the VTT standard should be kept.

(ii) The reference to ERI in table 2.15: the chair agrees with the comment. At the same time, the EU and CCNR standards refer to the ERI Code and the ERI code itself refers to UNECE. ERI should maintain a list of gauge ID. The chair will verify if this is the case.

(d) Comments by Switzerland and CCNR (paras. 11–12 of this document): the chair considers that his proposal in paragraph (a) should cover the issues raised.

⁵ The new text of the foreword, proposed by the chair, is reflected in the updated draft of the revised VTT Standard.

22. These comments and additional suggestions of the chair, including his comments on the editorial changes suggested by the secretariat, are reflected in the updated draft of the revised VTT standard.
