

Amendment proposal to the revised article 4.07 of CEVNI

Transmitted by the European Boating Association

The EBA Secretariat has been asked by EBA Members to express their concerns regarding the revised Article 4.07(4) as presented in the “zero” draft CEVNI 6 (CEVNI EG/2021/4):¹

“4. Competent authorities may require on certain inland waterways for which official Inland ENCs are available, that vessels that are equipped with Inland AIS devices, except ferries, shall also be equipped with Inland ECDIS devices in information mode, connected to the Inland AIS device.

The Inland ECDIS devices in information mode and inland electronic navigational chart shall be in conformity with the minimum requirements for ECDIS devices in information mode for using Inland AIS data on board vessels.”

Problem

Recreational craft with an Inland AIS device are generally equipped with a laptop or tablet or a PC with and HDMI connection for the display and a USB keyboard. The device will be running a system such as PC Navigo (<https://www.pcnavigo.com>).

Such equipment does not comply with the strict standards detailed in the Inland ECDIS standard as laid out in Resolution No. 48. However, to date this has not been an issue because Resolution No. 61 article 7-4.1 is not applied to recreational craft by Chapter 21 of Resolution No. 61.

Resolution No. 61 article 7-4.1:

“7-4 RADAR EQUIPMENT AND RATE-OF-TURN CONTROL

7-4.1 The radar equipment and rate-of-turn indicators must be of types that have been approved by the competent authorities. The requirements of the competent authority concerning installation and operational monitoring shall be met. Inland ECDIS equipment which may be used in Navigation Mode shall be considered to be radar equipment. The Inland ECDIS equipment shall also meet the requirements of the Inland ECDIS Standard prescribed by resolution No. 48 (TRANS/SC.3/156), revised.”

The EBA’s concern is not that Inland ECDIS is required per se, it is that considerable expense would be incurred if recreational craft were required to procure equipment compliant with Resolution No. 48.

The Police Regulations for the Navigation of the Rhine, Article 4.07(3), allow “comparable visualisation systems”, but this is not the case in the revised Article 4.07(4) as presented in the “zero” draft CEVNI 6.²

¹ Approved by the CEVNI Expert Group at its thirty-third meeting, see the appendix to CEVNI EG/2020/13, para. 3 (renumbered in CEVNI EG/2021/4 as para. 4).

² *Note by the secretariat:* At its thirty-third meeting, the CEVNI Expert Group agreed to delete the text “comparable chart display devices” in the final amendment proposal for Article 4.07, para. 4, the second indent (see CEVNI EG/2020/8/Rev.1).

Request

EBA would be grateful if the CEVNI Expert Group could discuss the intent of Article 4.07(4) with respect to recreational craft. Is it the CEVNI Expert Group's intention that all recreational craft (irrespective of size) that are equipped with AIS, must be equipped with an Inland ECDIS device in information mode which meets the requirements of Resolution No. 48, if competent authorities require it (on certain inland waterways for which official Inland ENC's are available).

If this is the CEVNI Expert Group's intention, then the EBA would like to understand the justification for such requirements.

If this is not the CEVNI Expert Group's intention, two possible solutions are proposed:

Solutions

(a) A "comparable chart display device" could be permitted for recreational craft of any length, e.g.:

"4. Competent authorities may require on certain inland waterways for which official Inland ENC's are available, that vessels that are equipped with Inland AIS devices, except ferries, shall also be equipped with Inland ECDIS devices in information mode, connected to the Inland AIS device.

The Inland ECDIS devices in information mode and inland electronic navigational chart shall be in conformity with the minimum requirements for ECDIS devices in information mode for using Inland AIS data on board vessels. **However, sports or pleasure craft may be equipped with a comparable chart display device which is connected to the AIS device".**

(b) Recreational craft could be excluded from the scope of paragraph 4, e.g.

"4. Competent authorities may require on certain inland waterways for which official Inland ENC's are available, that vessels that are equipped with Inland AIS devices, except ferries **and sports or pleasure craft**, shall also be equipped with Inland ECDIS devices in information mode, connected to the Inland AIS device.

The Inland ECDIS devices in information mode and inland electronic navigational chart shall be in conformity with the minimum requirements for ECDIS devices in information mode for using Inland AIS data on board vessels."
