
Economic Commission for Europe**Inland Transport Committee**

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Working Party on the Transport of Dangerous Goods

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Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)

Forty-fourth session

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Item 3 (b) of the provisional agenda

Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN): special authorizations, derogations and equivalents

ECE/TRANS/WP.15/AC.2/2024/48 (European Barge Union/European Skippers Organization (EBU/ESO))

"HGK/Seafar" project on the use of remote control technology on inland waterway vessels transporting goods that fall under the scope of the ADN – Phase 2 and 3a

Transmitted by the Government of Germany

(using eTranslation tool, provided by EU Commission, Directorate-General for Translation)

Introduction

1. Germany thanks the EBU/ESO delegation for the detailed analysis of the existing rules. The special need for technology to compensate for the increasing shortage of skilled workers, including in inland waterway transport, is recognised.
2. Particularly important is the statement that in both phase 2 and phase 3a the "main responsible skipper" is always on board the vessel.

Additional Questions

3. Germany sees a number of other issues that need to be examined.
4. It is not yet known whether, according to the inland navigation police regulations, the remote control centre is legally and organizationally regarded as part of the ship, and whether the operator is then a member of the ship's crew or a subcontractor. However, subsection 1.1.4.6 of ADN "Applicability of other regulations to transport by inland waterways" applies, according to which remote control must be permitted under the general maritime police regulations and must also be carried out as prescribed therein.
5. **1.3.2.2.1:** Do the personnel of the remote control centre (the operator and all other persons involved in the voyage of the vessel) also need to be instructed on a task-related basis? To what extent?
6. **1.3.2.2.5 and 5.4.3.2:** Does the boat master also have to inform the staff of the remote control centre of the written instructions and must the latter also be able to understand the written instructions? Does the boat master have to ensure that each person in the remote control centre understands the instructions and is able to apply them correctly?

7. **1.3.2.3:** Does the remote control centre staff involved in the navigation of the vessel also need to receive safety instructions?
 8. **1.3.3:** With which employer must the documentation of the training be kept?
 9. **1.4.2.2.1 g) and 8.1.2.4:** Does the boat master have to make sure that the written instructions are in the remote control centre and that they are stored there in such a way that they are easy to find?
 10. **1.8.1.4:** Can controls be carried out at the remote control centre as part of the carrier's business? Which Contracting Party is responsible if the remote control centre is located in country A but the ship is travelling in country B?
 11. **1.8.3.1:** Does the operator of the remote control centre have to appoint one or more Dangerous Goods Officers because his activity involves the transport of dangerous goods?
 12. **1.10.:** Does the remote control centre have to be included in the prescribed security measures? Is the operator in the remote control centre also a 'member of the ship's crew'? Then his photo ID cannot be on board after 1.10.1.4, because he himself is not on board. Where does this photo ID have to be available? With which employer must the description of the training referred to in 1.10.2.4 be kept?
 13. Special challenges may arise for a remotely connected helmsman from 7.x.5.4 idle and 7.1.5.5 stopping the ships, if the currently on duty helmsman is not on board and he can therefore not clearly recognize and evaluate the local conditions.
 14. As far as it is known, the remote control centre involved may also be located outside the State in which the ship is travelling. Therefore, in the event of possible infringements of the rules on the transport of dangerous goods by inland waterways, the skipper on board must continue to be the legal addressee of the competent authorities. This also applies if a violation is detected or assumed at a time when the operator in the remote control centre has control over the ship.
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