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ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on Inland Water Transport

Working Party on the Standardization of Technical  
and Safety Requirements in Inland Navigation  
(Twenty-first session, 14-16 March 2001,  
agenda item 6)

**MINIMUM MANNING REQUIREMENTS AND WORKING AND REST HOURS  
OF CREWS OF VESSELS IN INLAND NAVIGATION**

Transmitted by the Governments of Germany and Poland  
as well as by the European Commission

Note: The secretariat reproduces below comments and remarks by the Governments of Germany and Poland as well as by the European Commission relating to the text of the draft recommendations on minimum manning requirements and working and rest hours of crews of vessels in inland navigation as provisionally agreed by the Working Party, at its nineteenth session (TRANS/SC.3/WP.3/2001/1).

## **GERMANY**

### **Ad Article 6: Mandatory rest period**

1. The proposed wording of the third entry of paragraph 1, reading “In operating mode B, all crew members shall have 12 hours’ rest time per 24-hour period, including at least [a] 6 hour period of uninterrupted rest.” could only be accepted if the minimum crew numbers required under articles 10 to 12 for operating mode B were twice those required for operating mode A<sub>1</sub>. However, as this will not regularly be the case, the boatmaster or the owner of the vessel must be given a possibility to make arrangements for flexible service hours of the crew, regard being taken of the mandatory rest period. The time framework provided for this purpose, i.e. 12 hours per 24-hour period, is too short.

2. This is why the Government of the Federal Republic of Germany objects to the proposed wording. The wording in document TRANS/SC.3/WP.3/2000/4 must be retained.

### **Ad Article 8: Ship’s log [-Tachograph]**

3. The proposed wording of the second entry in paragraph 1 cannot be accepted for the following reasons.

4. Both the ship’s log and the tachograph serve the purpose of verifying the operating times of the vessel prescribed under article 5 as well as the observance of the mandatory rest periods of the individual crew members prescribed under article 6.

5. If the ship’s log served only the purpose of verifying the vessel’s operating times, the current proposal would be justified. However, as the observance of the minimum rest periods of the individual crew members, including the boatmaster, is to be verified with the help of the ship’s log, the wording in document TRANS/SC.3/WP.3/2000/4 must be retained.

## **POLAND**

6. The Polish side agrees with the norms concerning minimum safe manning requirements and working and rest hours of crews of inland navigation vessels, as set out in TRANS/SC.3/WP.3/2001/1.

## **EUROPEAN COMMISSION**

7. As the European social partners indicated their willingness to come forward with their own proposals concerning the issue of manning requirements, the European Commission is waiting for an initiative to be taken by them. The development of chapter 23 in the framework of the Central Commission for the Navigation of the Rhine (CCNR) is equally of importance in this respect.

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