



Hand-out on behalf of meeting concerning small vessels Unit MOVE D3 “Ports and Inland Navigation”

The CCNR has shifted its focus:

- from setting conditions to make shipping possible (think of sufficiently safe berths)
- to mainly setting conditions for the ships themselves.

CCNR-regulations: adaptation requirements to existing ships

- until 2003 ships had to adjust to new construction requirements in case of conversion, renovation or new construction.
- After 2003, it was determined that all existing ships retroactivity on new construction requirements.

This means

- a cold remediation of almost all small ships (until 1.500 tons).
- unfair competition with other modes of transport such as the truck sector (high investments)
- unfeasible high investment costs in relation to the turnover for measures that do not benefit safety in any way

the German research report 2001:

New technical requirements for the owners have very different meaning:

- from very low additional costs for newly build ships to
- high conversion costs and long repair times, in case of old ships.

On economic grounds, sometimes even technically, not executable.
with hardly any effect on safety at all.

the CCNR report "ships of the future" (2002):

- "the transitional rules in their current form, thus contributing to a certain degree of preservation of the older segments of the fleet."
- "Finally the question to what extent the continuation of this tradition stands in the way of socially desired and market-based development of the Rhine and inland waterways."
- "There is more need for a revitalization of new construction, then to preservation of the existing fleet"

Conclusion: the CCNR has consciously controlled a cold remediation of an essential part of the existing fleet.

the CCNR also wrote in the same report:

- "At the remediation of the existing situation is to avoid that certain fleet segments in proportion be more severely affected than others."
- and
- "Balance and proportionality therefore serve as criteria (related to the relationship between increased safety and effort required) for members starting point of measures and their effects."

The segments of smaller vessels are proportionally way more effected, bringing damage to the diversity and competitiveness of the inland navigation fleet



**Development of Dutch inland vessels by loadcapacity last 10 years:
 loss of 630,000 tons of freight transport by smaller ships due to a
 decrease in ships 0-2.000 ton = 21.000 trucks**

year	< 1.000 t	1.000-2.000t	2.000-3.000t	> 3.000 t
2011	2607	1261	978	656
2016	2283	1178	929	717
2021	1995 = -23%	1159 = -8%	934 = -4,5%	782 = +19%

Conclusion:

- the smallest ships are quickly disappearing.
- The slightly larger ships (up to 1,500 tons) will follow.
- The number of cases that have been stopped as a result of the Transitional Provisions as of 2010/2015/2020 is not that big, so the problem will not be too bad?
- It is worse than it seems because many ships have taken a Communautair certificate: that results in a delay of 15 years.
- (because of that) You hardly see small ships on the Rhine anymore.

Number of ships entering into the transitional provisions ending in 2035

Investigate motor freighters plus motor barges

1. Concerns: motor cargo vessels + motor barges
2. Source: IVR ship database dated 23-05-2022
3. No carrying capacity has been registered for 35 ships
4. Of 27 ships the year of construction is <1900 or not registered

Building year 0-2022

country	Number of registert vessels	Capacity (tonnage)
Belgium	1.059	1.182.174
Germany	887	1.129.774
The Netherlands	2.487	3.852.955
Grand total	4.433	6.164.903

Building year 0-1976

Country	Number of registert vessels	% of total	Capacity (tonnage)	% of total
Belgium	853	80,5%	625.194	52,9%
Germany	761	85,8%	832.004	73,6%
The Netherlands	1.544	62,1%	1.488.001	38,6%
Grand Total	3.158	71,2%	2.945.198	47,8%

Building year >1976

Country	Number of registert vessels	% of total %	Capacity (tonnage)	% of total
Belgium	206	19,5%	556.981	47,1%
Germany	126	14,2%	297.770	26,4%
The Netherlands	954	38,4%	2.364.954	61,4%
Grand Total	1.275	40,4%	3.219.705	52,2%

Of the 4,433 (Dutch, German and Belgian) dry cargo ships, 3,148 were built before 1976. They must meet impossible CCNR requirements with the aim of disappearing. That is 71.2% of the inland shipping fleet!



Shipname Desafio. Built: 1969. Length: 85,87m, Width: 9,50m, max. ton: 1.445 ton

The value of inland shipping

- The researchers of The University of Cambridge have concluded that more goods need to be transported by small inland vessels due to the climate change.
- Whilst the importance of small inland vessels is demonstrated, reality is that hundreds of vessels of this category (vessels < 1.500 tonnes) have been scrapped in the Netherlands
- Their future perspectives are jeopardized by the technical prescriptions of the CCNR, that show hardly benefits on safety but do show high investment costs.
- Their transport performance is taken over by thousands of trucks, a negative modal shift.
- Also with new requirements, such as requirements for engines (stage V), it must be checked whether the requirements are possible.
- Setting requirements that mean that ships can no longer exist will result in a shift from transport by water to transport by road, which means an immense increase in CO2 emissions.

Environment issues

- Replacing thousands of older, but often excellent ships will also be an enormous burden on the environment.
- Isn't that contrary to the pursuit of sustainability?
- Times have changed since 2002, let's adapt to the new time and not continue a once chosen route just because the CCNR once thought it was the best route for the future

What do we want?

- We want to preserve the existing valuable fleet.
- We want technical prescriptions of the CCNR, that show benefits on safety and/or environment in perspective to investments
- We want technical prescriptions which are possible to do (payable and technically possible)
- We want technical prescriptions which have demonstrated their utility and necessity

The CCNR must go back to the situation as it was until 2003. From that point the CCNR or the European Committee should make a new start, doing things right.

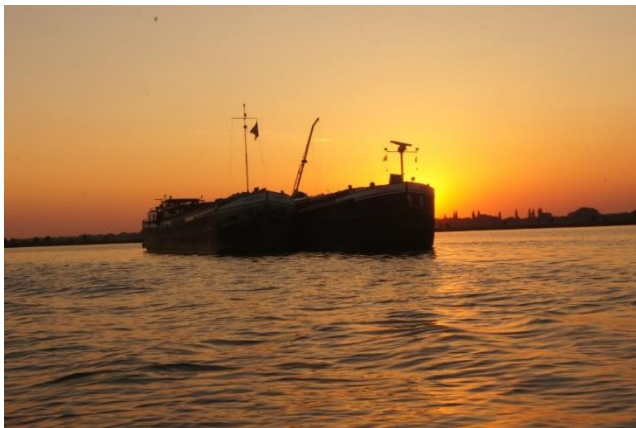
until 2003 ships had to **adjust to new construction requirements in case of conversion, renovation or new construction.**

Actions towards the CCNR:

- 3 times the ASV went to Strasbourg to the CCNR to explain what the consequences are
- There were letters from ESO and EBU, question: return to the regulation as it was before 2003.
- We gave mister van der Werf (the Secretary General of the CCNR) a Welcome Committee in Rotterdam, asking to stop the way the CCNR is acting:
- We offered 1,000 petition signatures "STOP the CCNR" to mister Theologitis (DG MOVE) and mister van der Werf (CCNR):

What are we talking about? Among other things:

- - Waste oil tank; 1.5 x all crankcase contents; (where do you leave this)
- - Buoy or railing of 70 cm around decks (often a problem with creep height)
- - Vent gas oil 1.25 x the fill
- - Location of the collision bulkhead (aft peak?) year of construction '76
- - Gas oil tanks not adjacent to accommodation built in '76
- - Emergency exit machine room A>35m² or Dmax >5m
- - Minimum speed (trial run) 13 km/h (also if coupled)
- - Maneuvering properties (trial run according to guideline 1 and 2
- - Steering suitable for heeling 15 degrees and temp -20 to +50 degrees
- - Second steering gear meets main steering gear requirements
- - Emergency device for non-hydraulically liftable wheelhouses
- - Necessary documents, complete set of electrical drawings to SI
- - Requirements for electronic installations
- - Requirements for electromagnetic compatibility
- - Gangway according to requirements New construction for ships built after 1994
- - Entrances at least 190X60cm
- - Emergency exits at least 0.36m² / 0.5m
- - Dangerous substances and gas pipes
- - Other provisions regarding accommodation, including height min 2m, width stairs, bed min 200X90cm etc.
- - (after 2041) bow anchors in anchor niches



Algemeene Schippers Vereeniging
kantoor Helsinki, Koninginneweg 1, 3331CD Zwijndrecht
+31611887791 * +31610977114 * +31653190459
info@algemeeneschippersvereniging.nl