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**HARMONIZED PROCEDURE FOR CONSIDERATION OF APPLICATIONS FOR
RECOGNITION OF SHIP'S CERTIFICATES AND BOATMASTERS' LICENCES:
MUTUAL RECOGNITION OF BOATMASTERS' LICENCES**

Submitted by the Central Commission for the Navigation of the Rhine*

Note by the secretariat: At its fifty-first session, SC.3 requested the secretariat to gather the basic documents of CCNR and the European Commission on the recognition of boatmasters' licences with a view to drawing up a common document on that subject (ECE/TRANS/SC.3/178, para. 26). In its communication to the thirty-third session of SC.3/WP.3, CCNR indicated that the annex to protocol 4 of its resolution (2005-I) contained an analysis of the harmonization of Community requirements for boatmaster licences with the Rhine Licensing Regulations (ECE/TRANS/SC.3/WP.3/2008/26). The Working Party may wish to take this analysis, reproduced in the annex, into account and to transmit it as one of the basic documents to its group of volunteer experts on the recognition of boatmasters' licences.

* The secretariat has reproduced the document as received.

Annex

HARMONIZATION OF COMMUNITY REQUIREMENTS FOR BOATMASTERS' CERTIFICATES WITH THE RHINE LICENSING REGULATIONS (ANNEX 1 OF PROTOCOL 4 TO RESOLUTION 2005-I)

I. INTRODUCTION

1. Pursuant to the Convention of 14 December 1922 incorporated into the Mannheim Convention, the Rhine boatmasters' licence, issued by the competent authority of a contracting State, is mandatory for navigation on the Rhine. The 1922 Convention stipulates that the boatmasters' licence must mention the waterways and categories of vessel for which navigation is authorized. There are four kinds of licence depending on the size and/or function of the vessel; the criteria for obtaining them are set out in the Rhine Licensing Regulations. Other regulations such as the regulations relating to safety personnel for passenger vessels and the radar licensing regulations are also relevant to this question.

2. While the Rhine licence is always required on the Rhine, there are provisions for dispensations and derogations in the regulations. These allow applicants holding navigation certificates valid for other waterways to obtain the Rhine licence without taking all the examinations required under the normal procedure. Such dispensations are, however, never absolute: for knowledge specific to Rhine navigation,¹ i.e., knowledge of the regulations in force on the Rhine and of navigation in a given section, a special examination for the Rhine licence must be taken in all cases. Thus these dispensations and derogations recognize only a partial equivalence between the Rhine licence and other boatmasters' certificates. Additional Protocol No. 7 to the Revised Convention for Rhine Navigation (Mannheim Convention), which entered into force on 1 December 2004, goes further; it allows CCNR to recognize other certificates as equivalent to the Rhine boatmasters' licence.

3. In the Community, two directives have been adopted in respect of boatmasters' certificates. Directive 91/672 EEC first established the principle of reciprocal recognition of national boatmasters' certificates between member States and the Community. The Community later undertook to harmonize the criteria for obtaining national boatmasters' certificates. Directive 96/50 proposes a standard national certificate, while leaving States the responsibility for issuance. These directives recognize the Rhine licence as valid for navigation on all the Community's waterways. National waterways not connected with the navigable waterways of other member States are not covered by these directives.

4. In its white paper COM 2001/370 the European Commission expressed the desire to continue its harmonization work in this field. In this connection, it wrote to CCNR on 29 April 2003 asking under what conditions it could recognize a Community certificate as

¹ Art. 3.05 (3).

valid for navigation on the Rhine. This work was carried out by the Committee for Social Security, Employment and Training Questions and the Working Group on Social Security, Employment and Training of CCNR.

5. Before considering the conclusions of CCNR, it is important to understand the scope of the study. First, the Community boatmasters' certificate is already valid for sailing on the Rhine below the Spijk ferry.² Above the Spijk ferry, the principal licence (*grande patente*) is required to sail vessels of 35 metres or more, and vessels intended to carry 12 or more passengers. The minor licence (*petite patente*) is required for sailing vessels of less than 35 metres. The Community directive applies to boatmasters' certificates for vessels of 20 metres or more intended for goods transport, and for vessels intended to carry 12 or more passengers.³ There are thus two distinct situations. National certificates issued in accordance with the Community directive will need to be recognized as equivalent to the minor licence for goods vessels of less than 35 metres and at the same time as equivalent to the principal licence for goods vessels of 35 metres or more and vessels intended to carry 12 or more passengers, which account for the overwhelming majority of traffic on the Rhine. The study concentrates mainly on the conditions required to obtain the principal licence and refers to the minor licence only when the criteria diverge.

6. In the face of such constraints, the work of comparing and then harmonizing, the content of these two texts will never produce a perfect result, for it is a matter of comparing two instruments that share neither the same objective, nor the same scope. The Community directive, by definition, sets forth only broad licensing criteria, leaving States some flexibility in transposing it into domestic law.⁴ The aim of the directive is not to standardize, but to harmonize, national regulations to the extent necessary to avoid distortions of competition and permit the free movement of labour. Obviously differences will remain between national regulations, within the limits set by Community law. Conversely, the Rhine regulations aim to standardize member States' regulations in this field. As a result they form a complete body of regulations and are thus inevitably more detailed than the Community directive, establishing not only the criteria for obtaining the licence but also procedures for examinations and for issuing the licence. The authorities competent to issue the licence are listed by name, and the procedures they should follow are set out, mainly in the form of "directives" addressed specifically to them. In practice, the competent authorities of the various member States work in close cooperation. Because they are so detailed, the Rhine regulations are more akin to the national regulations that transpose the Community directive.

² Article 1.03 of the Rhine Licensing Regulations.

³ Article 3 of the directive.

⁴ In particular, they have the authority to impose additional requirements concerning knowledge of the local situation, or for the sailing of passenger boats, after consultation with the Commission (art. 8, para. 2).

7. There are two possible ways to establish equivalence between two such texts, which differ in nature and purpose:

(a) The content of the directive can be amended to bring it closer to the conditions established by the licensing regulations (limited amendment). The changes would mainly consist in filling out the detail of some of the licensing criteria. In this approach the quest for harmonization would focus on the Community directive, which would thus directly correspond to the objective sought. However, this method has the disadvantage of being slow because of the sluggish pace of decision-making in the Community. Furthermore, the final result will never be complete, as additional requirements will always apply for the Rhine, notably knowledge of individual sections;

(b) The alternative is for the European Community (EC) to adopt a completely new, much more far-reaching and detailed directive (major revision). On the one hand this directive would establish several types of Community certificates of varying standards reflecting the varying difficulty of navigating different European rivers, and/or the kind of vessel. On the other hand, it would not be limited to establishing the conditions for obtaining the Community certificate. It would also govern the modalities for the issuance of the certificates, which are at present up to the EC member States. This approach would also permit coverage of the Danube.

8. Because amending the directive in any way could easily take several years, an interim solution might be to establish equivalence through the national regulations transposing the Community directive. Each State would be free to transpose into its national regulations the requirements set out in the directive, having due regard for the licensing regulations and in accordance with conditions that could be established in the implementing regulations called for in Additional Protocol No. 7. CCNR could then grant recognition to licences issued on that basis.

9. With a view to the possible recognition of Community boatmasters' certificates on the Rhine, a study was made of the following aspects:

- I. Licensing criteria;
- II. Licensing procedures;
- III. Recognition and monitoring.

II. ANALYSIS AND COMPARISON OF LICENSING CRITERIA

10. The licensing criteria for the Rhine licence and the Community certificate fall into three categories:

1. Professional competence, which includes:
 - 1.1 Specialist knowledge (theory) of inland navigation; and
 - 1.2 Professional experience;

2. Aptitude, including physical (see No. 1) and psychological fitness, minimum age and propriety;⁵
3. Additional skills, in particular knowledge of the sections.

11. The study considered and compared each of these three criteria in turn. A summary table is presented at the end of each section showing the additional requirements that would need to be adopted under Additional Protocol No. 7 and established as part of the CCNR regulations on recognition of the equivalence of the Community certificate, in the event that the Community directive remains in its present state. The second column of the table indicates the proposed changes to the directive in the event of a limited amendment, as outlined in paragraph 7 (a), above.

1. Professional competence

(a) Specialist knowledge

12. Broad specialist knowledge: specialist knowledge includes seamanship and knowledge of the rules of navigation, in particular signals. These requirements, which are set out in annexes to both sets of regulations, are generally equivalent. Only the reference to the regulations for the transport of dangerous goods is missing from the Community directive. No change is suggested here, as this regulation will soon be integrated into Community law through another directive, which is still being drawn up. The directive requires the applicant to know the European Code for Inland Waterways (CEVNI), while the Rhine Licensing Regulations requires knowledge of the Police Regulations for the Navigation of the Rhine (RPNR). However, the two sets of regulations are considered to be more or less equivalent, so the additional requirement linked to knowledge of RPNR could simply be knowledge of specific police regulations, which would have to be tested as part of the knowledge of sections (see paragraph 20, below).

13. Additional specialist knowledge for sailing passenger vessels: the Community directive and the Rhine regulations set out additional requirements for sailing passenger vessels, chiefly the presence on board of a crew member (not necessarily the boatmaster) with knowledge of the required safety procedures. These provisions appear in article 10 of the directive. In the Rhine system, they are the subject of separate regulations relating to safety personnel for passenger vessels (2004-II-22(II)). These additional requirements are not a condition for obtaining a boatmasters' certificate, as they do not necessarily concern the boatmaster. They are more related to the composition of crews and there is no suggestion that harmonization is needed here.

14. Additional specialist knowledge for sailing with radar: in thick weather, all vessels under way must use radar.⁶ In theory, then, the radar licence is not automatically required, but in practice it is always necessary for navigation on the Rhine. The Community directive deals with

⁵ This criterion appears only in the Licensing Regulations.

⁶ Article 6.30 of RPNR.

both the radar certificate and the boatmasters' certificate, while in the Rhine system the two licences are covered by two separate regulations. The Regulations for the Issuance of Radar Licences (RDPR) set more stringent and detailed licensing criteria than the Community directive. In particular, in the case of the Rhine, an applicant must have a radio operator's certificate,⁷ which is not required by the Community directive. CCNR admits that it is not necessary to make this a precondition for obtaining a radar licence. The radar licence examination contains one theoretical and one practical part on the subjects listed in annex I to the regulations. The directive goes into less detail on the contents of the examination in sailing by radar. In the first place it calls for only a theoretical examination and no practical. In addition, the subjects listed are far less detailed. General recognition of radar certificates issued under the Community directive will only be possible once the directive sets out the content and modalities of the examination. As things stand, only radar certificates issued on the basis of an examination similar in content to the one described in the annex to RDPR will be recognized on the Rhine.

Regarding the form of the certificate, RDPR provides a standard form of radar licence for member States. However, it also permits radar certification to be noted by the word "radar" on the boatmasters' licence,⁸ as does the directive.⁹

Amendments to Rhine Licensing Regulations	Additional requirements (directive not amended)	Amendments to directive (limited amendment)
	Only radar certificates issued on the basis of an examination similar in content to the one described in the annex to RDPR will be recognized on the Rhine.	Bring radar licensing criteria into line with RDPR criteria.

(b) Professional experience

15. The requirement is for four years of experience for the principal licence and the Community certificate and one year for the minor licence. The experience criterion as established by the directive, including exceptions and derogations, matches all the requirements of the Rhine Regulations for the minor licence. Therefore, the following analysis will consider only the equivalence of the Community certificate with the principal licence. The Rhine Licensing Regulations are more detailed than the directive, and state that the experience must be acquired as a crewman or engine-minder for a period of two years, or as a leading crewman for a period of one year.¹⁰ The directive merely indicates that the experience must be acquired as a member of a ship's deck department. This lack of precision is due to the fact that, at the

⁷ Article 2.01 (c) of RDPR.

⁸ Art. 3.04, para. 2.

⁹ Art. 9, para. 2.

¹⁰ Crewman is defined in the regulations on crews (chapter 23 of RVBR).

Community level, there is not (yet) any regulation on crew composition that defines the various functions for sailing vessels. However, their vagueness on this point does not prevent the Community provisions from being recognized as equivalent to the Rhine regulations, even if it would be desirable eventually to make the directive more specific on this point. The Rhine regulations establish that 180 days count as one year of navigation, while the directive is not specific: in the Community context it is for each member State to set the effective number of days that correspond to one year. This leads to major disparities between national regulations (from 100 to 180 days). Thus, a recognition of the Community certification in its current form would create inequality of treatment among boatmasters, as they are not subject to the same experience requirements. Recognition without additional conditions established in an implementing regulation would only be possible following a major revision of the directive establishing 180 days as equivalent to one year for licences to be recognized on the Rhine.

16. Criteria for reducing navigation time: both texts stipulate that the four-year sailing experience requirement may in certain cases be reduced.

(a) Experience gained at sea

Both regulations provide for a reduction for experience gained at sea. However, the reduction under the directive is greater than the one under the Rhine Licensing Regulations. The Rhine regulations grant a maximum reduction of two years, and stipulate that 250 days of navigation at sea is equivalent to one year. The directive allows member States to grant an applicant who can prove sea sailing experience a reduction of up to three of the four years' experience required. The directive does not specify that such experience must be acquired as a member of a deck department, nor does it specify how many days are equivalent to one year's experience of sailing at sea. It is suggested that the directive should be brought into line with the Rhine provisions in this regard. One year's experience of inland navigation can hardly be considered sufficient to meet the requirements of professional experience for inland navigation.

(b) Recognized training with practical work

Here too, both regulations provide for a reduction in the experience required if training has been successfully completed, but differ on the amount of the reduction. The Rhine regulations grant a reduction of two years, while the directive provides for a maximum reduction of three years. The licensing regulations could be amended to bring them into line with the directive (see also paragraphs 21 and 25, below).

(c) Practical examination

The directive stipulates that a maximum reduction of three years may be granted to an applicant who takes a practical sailing examination; certification is then limited to vessels nautically similar to the vessel used in the practical examination. The Rhine regulations make no provisions for such a reduction. Consequently, certificates obtained on this basis cannot be recognized on the Rhine unless a service record is presented certifying that the holder has the four years' experience required by the Rhine Licensing Regulations. The certificate explicitly states if it was obtained in this way, so this additional condition could

be easily implemented in practice. It should be noted that the restrictions imposed by the directive, in particular concerning the kinds of vessel for which a certificate thus obtained is valid, will continue to be applicable on the Rhine.

As a matter of principle, the practical examination is not ruled out. In certain circumstances it can make access to the profession easier, and the use of simulation techniques could make this approach more attractive. However, it is important to define the modalities for such an examination and to assess its advantages and disadvantages before bringing it into general usage and determining the permissible reduction in sailing experience.

Amendments to Rhine Licensing Regulations	Additional requirements (directive not amended)	Amendments to directive (limited amendment)
<ul style="list-style-type: none"> - Amendment to article 2.01.3 (a) Maximum 3-year reduction where training successfully completed. 	<ul style="list-style-type: none"> - Certificates issued on basis of 1 year's experience plus practical examination recognized on the Rhine only on presentation of a service record certifying that the holder has the sailing experience required by the Rhine Licensing Regulations; - Certificates issued on basis of fewer than 180 effective days' sailing per year recognized on the Rhine only if supplemented to meet the required number of days under the Rhine regulations. 	<ul style="list-style-type: none"> - Amendment to article 7, paragraph 3 (b): Maximum 2-year reduction for experience of sailing at sea; - Specification of number of days equivalent to one year of sea and inland sailing.

2. Minimum age and fitness

(a) Minimum age

17. Both regulations stipulate that applicants must be 21 years of age. However, the directive allows member States to issue certificates from the age of 18, but other member States are not obliged to recognize the certificate until the holder reaches the age required by their own regulations. Similarly, Community boatmasters' certificates are recognized on the Rhine only if their holders have reached the age of 21.

18. Propriety: issuance of the Community certificate does not require applicants to present their police record or any other document certifying their propriety. It is a condition for obtaining the Rhine licence, but is not an additional requirement for recognition of the Community certificate as valid for the Rhine.

(b) Physical and psychological fitness

19. (1) Content of the medical examination: on this point the directive is basically compatible with the Rhine regulations, but in respect of the content of the examination it is not sufficiently detailed to be recognized on the Rhine without additional guarantees. The directive says only what aspects should be checked, but sets no criteria for their evaluation. It should be noted that the Rhine Licensing Regulations were recently updated in this regard, and the provisions in question thus reflect the practice in this field. General recognition of the Community certificate in its present form would require amendment of the directive to ensure that the results of medical examinations mean the same as the results of medical examinations carried out under the Rhine provisions.

Obviously, there is nothing in the directive keeping the States of the European Union from immediately adopting the provisions of the Rhine regulations, as certain member States of CCNR have already done. Pending amendment of the directive on this point, only those Community certificates issued on the basis of national regulations requiring a medical examination similar in content to the one described in annex B1 to the Rhine Licensing Regulations will be recognized on the Rhine.

(2) Repeat medical examinations: according to the Rhine regulations, proof of physical and psychological fitness must be renewed every five years as from the age of 50, and annually as from the age of 65 (art. 4.01 (1)). The directive (art. 6) does not call for repeat examinations every five years as from the age of 50. Harmonization on this point would be possible only as part of a major revision of the directive, which would make this a criterion of certificates to be recognized on the Rhine. If no major revision takes place, the holder of a Community certificate will have to present a new medical certificate every five years as from the age of 50 in order to be authorized as a boatmaster on the Rhine.

Amendments to Rhine Licensing Regulations	Additional requirements (directive not amended)	Amendments to directive (limited amendment)
	<ul style="list-style-type: none"> - Community boatmasters' certificates recognized on the Rhine only when holders reach the age of 21; - Only Community certificates issued under national legislation requiring a medical examination similar in content to the one described in Rhine Licensing Regulations (annex B1) recognized on the Rhine; - From age 50, Community certificate holders to present a new medical certificate to the competent authorities every five years. 	<ul style="list-style-type: none"> - New annex stipulating content of medical examination.

3. Additional skills

20. Relevant local knowledge (*Streckenkenntnisse*): over and above a general knowledge of navigation, applicants must demonstrate knowledge of the section to which the licence would apply.¹¹ This knowledge consists in practical navigation experience in the section in question (expressed as the number of voyages made, as certified by the service record) and theoretical and regulatory knowledge specific to that section (certified by examination). Only the authorities of the Rhine States and Belgium are competent to assess section knowledge and issue the corresponding Rhine licence. The directive allows member States to impose additional requirements for section knowledge (art. 8, para. 2). The examination rules and procedures are left up to the member States. In the same way, before they can navigate on the Rhine, holders of non-Rhine certificates must meet the same additional requirements on section knowledge as Rhine licence-holders, and in accordance with the procedures established in the Rhine Licensing Regulations.

III. ANALYSIS AND COMPARISON OF LICENSING PROCEDURES

21. In accordance with the conditions for recognition established by Additional Protocol No. 7 to the Revised Convention for Rhine Navigation (Mannheim Convention),¹² the modalities for issuing Community certificates must effectively ensure that equivalent conditions are applicable.

21bis. Procedure for knowledge assessment: the Rhine Licensing Regulations describe the examination procedure in detail and set out (in directives and special service notes) the specific requirements for the examination boards to be created by the member States. On the other hand, the member States of the European Community are free to choose the modalities for implementation of the Community directive. The examination procedure in the directive would need to be made more specific for alignment with the procedure in the Rhine Licensing Regulations. Member States could be invited to make and submit a list of the authorities competent to conduct the examination, similar to the procedure envisaged in article 10 of the draft directive on technical requirements. It would be highly desirable for the competent authorities to take steps to harmonize implementation practices so as to ensure the greatest possible uniformity in member States' implementation of the directive and the regulations. To that end, there should be provisions for cooperation at the operational level, including above all exchange of information. The same applies to recognized training that permits a reduction in the sailing time required. Directive No. 1, appendix 1, adopted pursuant to the Rhine Licensing Regulations, lists the accredited training centres and sets out for each the reduction in sailing time, expressed in number of days, to be granted to applicants successfully completing that training course. Article 2.1 of this directive mentions training "to a minimum standard set by

¹¹ Section knowledge is not, however, required downstream of the Spijk ferry.

¹² Article II of Additional Protocol No. 7 reads: "the Central Commission may recognize other [...] boatmasters' certificates when their issue is based on conditions equivalent to those it establishes in implementation of this Convention and procedures ensuring effective compliance with it".

CCNR". There is thus an oversight mechanism and delegations exchange information before a reduction is granted. Such a system would need to be developed at the Community level in order to ensure that the recognized training is indeed of a high enough standard to justify a reduction in navigation time.

22. Procedure for medical examination: in the Rhine system, the medical examination may be conducted only by physicians designated by the "competent authority" listed in appendix 1 to directive No. 2. The restrictive nature of this procedure is due to the fact that the physicians in question must have special competencies, notably in respect of the medical risks specific to this occupation. For its part, the Community directive states that the examining physician must be "recognized" by the "competent authority". Notwithstanding the difference in wording, in both cases it is the competent authorities of the member States that are responsible for designating the doctors or the medical centres with the required competencies. The Rhine system also provides a model medical certificate (annex B2 to the regulations) reflecting the specific criteria and limit values set out in annex B1 (although documents other than this model are recognized, see article 3.02.2). There is no model in the Community directive. The suggestion is to supplement the directive with a model medical certificate, similar to annex B2 of the Rhine Licensing Regulations.

23. Thus the licensing and issuing procedures established under Additional Protocol No. 7 with a view to ensuring effective equivalence of criteria for obtaining licences valid for the Rhine are not easy to implement for the Community directive. The Community directive regulates procedure very little, leaving this to European Union States' discretion when they transpose the directive into their domestic legislation. With the directive in its current state, any comparative study of licensing modalities would require an analysis of each national regulation transposing the Community directive, an undertaking both cumbersome and ineffective. The best solution would be to amend the Community directive to regulate the procedures for testing applicants' capability, along the lines described in paragraph 7 (b) above were that solution not possible, mechanisms for recognition and monitoring would be essential.

IV. RECOGNITION AND MONITORING

24. The above analysis and the proposed criteria for recognition assume in almost every case equivalence of the two sets of licensing criteria. Maintaining recognition over time presupposes that the individual regulations are not amended, or that any amendments are made in parallel and are similar for both texts. That will require the creation of monitoring mechanisms to ensure the maintenance of recognition over time, even with regular changes to the two texts. For changes are inevitable: the section knowledge required on the Rhine (and other rivers), for example, will evolve as integrated navigation systems are installed, in the next few years, while the Rhine Licensing Regulations were recently amended so that the medical examination would reflect recent developments in that field.

25. Furthermore, the modalities for testing applicants' competencies should ideally be harmonized so that equivalence on paper can be verified in practice. As noted previously, no modalities are set out in the Community directive. In the absence of any equivalence in licensing procedures, even before reciprocal recognition of certification, then there must at least be some mechanism for exchange of information and gradual harmonization. This would mean in

particular harmonizing the European service records and other documents certifying navigation time, harmonizing examination procedures, knowledge testing and medical examinations, and drawing up common criteria whereby recognized training courses would permit a reduction in required navigation time.

26. Such monitoring mechanisms are indispensable. They could be provided for in a memorandum of understanding (MoU) concluded under the cooperation agreement between CCNR and the European Commission, like the one currently being drawn up for the harmonization of technical requirements.

27. Lastly, the CCNR regulations would have to include ex-post oversight mechanisms and measures to be taken if those mechanisms reveal that the recognized certificate is not in conformity with the Rhine licensing criteria. Such measures are all the more necessary because the licensing procedures are not equivalent. Oversight would be of two main types:

- General oversight to ensure maintenance of the equivalence of the overall licensing criteria in the two cases. Should the criteria be seen to be no longer equivalent, CCNR may adopt a resolution rescinding recognition of the equivalence of the two documents. However, the monitoring and cooperation mechanisms established under the MoU should make it possible to avoid such a drastic step by ensuring that the two texts are regularly monitored and develop in parallel.
- Checks of individual certificates to ensure that the holder of a certificate recognized as equivalent effectively meets the conditions required for navigation on the Rhine. Such checks, would by definition be exceptional but would allow CCNR or the member States to withdraw or suspend validity for the Rhine where the holder is found not competent to sail there.

Summary table

The table below summarizes the three possibilities for recognition of Community boatmasters' certificates on the Rhine, as presented in the report.

Column 1 indicates the additional criteria, to be defined by CCNR in an implementing regulation, that would have to be met in order for national certificates issued under national regulations transposing the Community directive to be recognized on the Rhine, assuming the Community directive is not amended.

Column 2 describes the changes to be made to the Community directive if it is amended only as required for more general recognition of Community certificates on the Rhine.

Column 3 indicates the amendments to be made to the Community directive under a major revision establishing several types of Community certificate of varying standard; and also governing modalities for issuance.

Competencies	Regulation	Directive	Implementing regulation, directive unchanged	Limited amendment of directive	Major revision of directive
(a) Specialist knowledge	Art. 2.01, para. 2 (c)	-	-	-	-
(b) Professional experience (basis: 4 years)	Art. 2.01, para. 1	Art. 7, para. 1	-	-	Adoption of a standard service record.
Additional requirements	At least 2 years of experience as crewman or engine-minder, or 1 year as leading crewman (as defined in RVBR chap. 23)	Member of deck department	-	The directive should stipulate that part of the experience must be acquired by performing duties corresponding to the job description of crewman or equivalent function.	Harmonization of job descriptions.
Definitions	Art. 2.01, para. 3 1 year = 180 days	-	Certificates issued where effective days in navigation <180 days/year recognized on the Rhine only if supplemented and certified by the service record.	-	Directive to be supplemented with a definition of a year in terms of days. This should be 180 days for certificates to be recognized on the Rhine.

Competencies	Regulation	Directive	Implementing regulation, directive unchanged	Limited amendment of directive	Major revision of directive
Reduction in experience required I] Maritime experience	Art. 2.01, para. 3 (b) (2 years)	Art. 7, para. 3 (b) (3 years)	Community directive grants greater reduction than Rhine Licensing Regulations. Difference cannot be corrected through additional measures under an implementing regulation. Equivalence only possible by amending Community directive. Meanwhile, disparity tolerated on a transitional basis.	Reduction to be set at 2 years. Directive to be supplemented with a definition of one year of navigation, in terms of days. Duration should be 250 days.	Reduction in experience required I] Maritime experience
II] Training including practical work	Art. 2.01, para. 3 (a) Amend Rhine Licensing Regulations to set reduction at 3 years	Art. 7, sect. 3 (a) (3 years)	-	-	Specify types of training permitting reduction in navigation time, and amount of reduction. Specifications to be made either through harmonized references or by member States notifying the Commission of relevant training courses.

Competencies	Regulation	Directive	Implementing regulation, directive unchanged	Limited amendment of directive	Major revision of directive
III] Practical examination	-	Art. 7, para. 4	Certificates issued on basis of 1 year's experience plus practical examination recognized on the Rhine subject to acquisition of 3 more years' experience after initial examination, as certified by service record. Other criteria set by directive apply also to the Rhine.	-	Harmonize: - criteria for practical examination for Rhine and Community systems; - permissible reductions in navigation times.
(c) Passenger vessels	-	Art. 10	Boatmasters not authorized to sail passenger vessels on Rhine unless they or another crew member hold special certificate issued by the competent authority proving they have passed test of relevant specialist knowledge.	-	-

Competencies	Regulation	Directive	Implementing regulation, directive unchanged	Limited amendment of directive	Major revision of directive
(d) Radar licence	-	Art. 9, paras. 1 and 2	Radar licence recognized where issued on basis of examination similar in content to that described in annex to RDPR.	Specify the content of examination referred to in annex to Community directive.	Single European radar certificate.
(a) Aptitude: physical and psychological fitness	Art. 2.01, para. 2 (a)	Art. 6, para. 1	-	-	-
- Aspects and criteria	Annex B1	-	Community certificates recognized if issued on basis of medical examination similar in content to that established in annex B1 to the Rhine Licensing Regulations.	Harmonize aptitude criteria and specify content and scope of medical examination in annex to the directive.	
- Model certificate	Annex B2	-	-	Provide model medical certificate.	
- Repeat examination every 5 years from age 50	Art. 4.01, para. 1	-	From age 50, new medical certificate to be submitted to competent authorities every 5 years.	-	From age 50, repeat medical examination every 5 years, required for certificates recognized for the Rhine.

Competencies	Regulation	Directive	Implementing regulation, directive unchanged	Limited amendment of directive	Major revision of directive
- Minimum age	Art. 2.01, para. 1	Art. 5	Community certificates recognized on the Rhine provided holders are 21 or over.	-	Certificates recognized for the Rhine issued only from age 21.
(b) Propriety	Art. 2.01, para. 2 (b)	-	-	*	
Supplementary qualifications	Regulation	Directive	Implementing regulation, amended or not		
Knowledge of sections	Art. 2.01, para. 4	Art. 8, para. 2	Knowledge of sections, including derogations from navigation rules specific to section.		

* The German delegation may submit a proposal during the work on amending the directive to make this one of the criteria for the Community boatmasters' certificate.