

**Code:** CEVNI EG/2014/11

**Subject:** Working document for the twenty-fourth meeting

**Date:** 24 March 2014

**Author:** European Boating Association (EBA)

## **Provisions for small craft / sports or pleasure craft**

### **Requirements to have VHF, AIS and radar**

1. EBA would like to seek general clarification from the CEVNI Expert Group on the requirements for small craft / sports or pleasure craft to have VHF, AIS and radar. The understanding is that unless it is specified by the competent authority, VHF is not a requirement for a small craft unless it has either AIS or radar, in which case it must also have VHF. Is this correct?
2. As explained in document CEVNI EG/2014/8, article 6.30 implies that although small craft are not compelled to be fitted with radar, they are only able to navigate in reduced visibility if they are carrying radar. This article could usefully be explicit on the requirements for small craft.

### **Other requirements**

3. EBA would also like to propose that the CEVNI Expert Group consider whether there are any situations where small craft are not required to comply, which should also apply any sports / recreational vessels regardless of length.

### **Definitions**

4. EBA considers that the definition of reduced visibility is unclear as it does not indicate the extent to which visibility must be reduced for the conditions to be classified as reduced visibility (see definition 10 in article 1.01 d)).
5. EBA would like to check if the new “sports or pleasure craft” definition includes or excludes “water bikes”. The new definition reads: The term “sports or pleasure craft” means any vessel used for purposes of sports and recreation and not financial gain.
6. The terms “shipping” and “seagoing vessel” are used frequently but do not appear to have a formal definition. (The term shipping is used in: articles 1.01 d), definition 13; 1.04, paragraph 2 (c); 6.17, paragraph 1; 6.25, paragraphs 1 and 2; 6.26, paragraph 4; 7.01, paragraphs 1 and 2.)

### **Article 2.02 – Identification marks on small craft**

7. Article 2.02 could usefully expand on the identification marks for seagoing recreational craft which we believe should be the markings required by the Flag State. EBA would like to query the requirement under article 2.02 paragraph 3 for the name and domicile of the owner to be displayed in a conspicuous position inside or outside the craft. This has the potential to pose a security threat to the owner of the small craft, and EBA would therefore like to ask if this is necessary for a small craft which is registered in its flag state or has a navigation permit as in both of these cases the owner can be identified without the need for their details to be displayed.

### **Article 3.18 - Additional marking for vessels unable to manoeuvre**

8. It is unclear what is meant by a “swinging light” in article 3.18.

### **Chapter 6**

9. Chapter 6 (Rules of the Road) is in EBA’s opinion difficult to follow. Would there be a possibility of expanding article 6.02 to indicate which of the following articles in the chapter apply to small craft?