

Bilag

Søfartsstyrelsens besvarelse af "EU Commission; Public consultation on a review of EU passenger ship safety legislation" til høring af EU-Skibsfartspolitisk specialudvalg 18. juni 2012

Eftersom visse tekster bliver beskåret i den medsendte "pdf-fil", er teksterne hermed gengivet i sin fulde udstrækning som de vil blive indskrevet i den endelige besvarelse.

Spørgsmål nr.	Tekst
Section II.1 – 6	The European Commission has added to the uncertainty on the application of the directive 2009/45/EC by accepting mechanical propelled fishing vessels to be furnished with rig and sail and then certified as pure sailing vessels.
Section II.1 – 11j	Additional EU inspections according to 99/35/EC.
Section II.1 – 14	Survey on board should focus on known problems areas (risk-based), e.g. with special focus on the company ISM system.
Section II.2 – 2	There is no need to establish harmonised safety standards for trade between Member States because this is already covered by SOLAS regulations.
Section II.3 – 1 options 4, 5 and 6	Please note that Denmark does not distinguish between passenger ships types. If there is more than 12 passengers on board the ship is a passenger ship by definition. This is no matter whether the ship has mechanical propulsion or is a sailing ship.
Section II.4 – 2	The same level of safety should apply to any passenger ship, disregarding material of construction, propulsion concept or trading area. This can be achieved by combining technical and operational requirements. Additionally it shall be remarked that it is very difficult to assess the impact of new regulations of which the contents is not known.
Section II.4 – 4	It does not make any sense to establish common technical regulations for historical ships across Europe as these ships are – by definition – not to be in compliance with current regulations. If they were they would not be historical any more. Additionally the historical ships are of very different capabilities originally build for very different waters. Additionally it shall be remarked that it is very difficult to assess the impact of new regulations of which the contents is not known.
Section II.4 – 6	The purpose of tenders is to transport passengers between a "mother ship", typically a cruise ship, and a port on a very short distance in sheltered waters. IMO has developed guidance on the use of and requirements for ship tenders. It does not make any sense to include tenders in a passenger ship safety directive. Additionally it shall be remarked that it is very difficult to assess the impact of new regulations of which the contents is not known.

Section II.4 – 8	The current (strict) division between passenger and cargo ships may be undermined, and will compromise passenger safety, as transport of workers may be accepted based on cargo ship regulations. Additionally it shall be remarked that it is very difficult to assess the impact of new regulations of which the contents is not known.
Section II.4 – 10	The opinion of Denmark is; that voyages between two member states is an international voyage which is already covered by SOLAS.
Section II.5 – 1	Denmark finds many of the questions posed in this questioner ambiguous and thus reserves its position on all issues. Additionally Denmark finds the format of the consultation very unpractical for the workings of a national government.
Section III.1 – 6	It is a definite obstacle, which should be handled the same way as in the airline industry; videos, pictograms etc.
Section III.1 – 8	Obviously the launching of lifeboats has some limitations just as the large cruise ships have grown away from existing concepts. Accordingly alternative means should be investigated, which is already underway in IMO.
Section III.2 – 4	This process is already on its way within IMO.
Section III.2 – 6	If current regulation and guidelines are complied with within the ISM-Code such additional guidance seems not called for.
Section III.2 – 8	They could be more specific/ operational towards the industry.

Søfartsstyrelsen 18. juni 2012.