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Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods**

Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)

Twenty-seventh session

Geneva, 24–28 August 2015

Items 3 (c) and 4 (b) of the provisional agenda

Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN):**Interpretation of the Regulations annexed to ADN****Proposals for amendments to the Regulations annexed to ADN:****Other proposals****National interpretations: reply to document
ECE/TRANS/WP.15/AC.2/2015/18****Transmitted by the Government of Germany¹****Introduction**

1. The delegation of the Netherlands submitted some problems of interpretation to the Safety Committee in document ECE/TRANS/WP.15/AC.2/2015/18.
2. With respect to “continuous and suitable supervision of ... unloading” (section 2 of the annex to document ECE/TRANS/WP.15/AC.2/2015/18), in Germany there are written instructions addressing this question, as attached.

¹ Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/WP.15/AC.2/2015/32.



Interpretation of the Regulations annexed to ADN in Germany

3. Supervision of unloading.

Guidelines for implementation of the Ordinance on the Transport of Dangerous Goods by Road, Rail and Inland Navigation (GGVSEB) (guidelines for implementation of GGVSEB-RSEB)

- reference: ADN 1.4.3.7.1

The river regulations for the handling on water of dangerous goods also require constant on-shore **supervision** throughout the unloading, so as to ensure that it is possible to react immediately and to take the necessary and adequate steps, or to ensure that they are taken.

The supervision may be deemed to be **appropriate** also if it is carried out using auxiliary technical means allowing for the transmission to the control room of sufficiently clear images (with details), in particular of the piping and the connection parts, including in periods of low visibility. It must be possible to read the pressure meters in all weather conditions. It must be possible to immediately interrupt the handling operation, with constant communication ensured between the vessel and the shore. The port operator must approve the use of the auxiliary technical means.

Request for amendment

3. In section 1.4.3.3 of ADN (**Filler**), amend letter (u), as follows:

(text to be deleted is struck out)

“(u) He shall ascertain that during the entire duration of loading ~~or unloading~~—a permanent and appropriate supervision is assured.”

Justification: The filler carries out only the loading, not the unloading.
