

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

English

13 January 2017

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)**Thirtieth session**

Geneva, 23–27 January 2017

Item 4 (c) 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

“Blending on board inland tankers”**Transmitted by the Federation of European Tank Storage Associations, FETSA****I. Introduction**

1. Blending on board tankers; loading and mixing of oil distillates, hydrocarbons and bio components in the cargo tanks of tankers is common practise within the Netherlands, Belgium and other countries in the world.
2. The different components are loaded, via the dedicated cargo pipe line system, batch after batch, where after the components become admixed on board.
3. Blending on board can be defined as:
Blending on board describes the mixing of two or more products resulting in one single final product and reflects only components being admixed as distinct from any chemical processing.
4. Relevant Dutch industry bodies have the opinion that the risks related to blending on board of inland vessels is well managed; however, although “mixtures” of different substances are mentioned in chapters of the ADN, the blending as an activity and guidance on risk mitigating measures for the blending activity are not stipulated in ADN.

II. Practical issues

5. The fact that blending operations on board inland tankers are not specifically regulated in the ADN legislation has-led to discussions with National Dangerous Goods authorities, challenging those blending operations.
6. There is need for clarification in the ADN within the industry for blending activities on inland tankers.

III. Proposal

7. With this INF document the Industry would like to ask the ADN Safety committee to consider the following changes/additions to ADN:

The activity of blending on board is considered safe if the following risk mitigating measures are complied with:

1. Blending on board involves the mixing of two or more products only and does not include any chemical processing.
 2. The classification of the final product should be established prior the blending activity commences.
 3. The loading operation has to be performed closed if for any of the components to be loaded; carriage in closed cargo tanks is required.
 4. The instructions detailing the blending activity should be agreed between all stakeholders and the same should be available on board during the mentioned operations.
 5. Each individual component to be loaded should be included on the vessel substance list, ref ADN 1.16.1.2.5. For each component to be loaded and for the final product the documentation as specified in ADN 7.2.4.10 and ADN 5.4.1.1.2 should reflect the blending activity and the properties of the final product.
 6. The registrations of verifications carried out should be treated as documentation stipulated in ADN 8.1.2.3.
 7. The cargo and voyage registration should be reflecting the blending activities as carried out.
 8. The loading operation, concerning blending on board, should be covered by:
 - Prior the loading operation the ADN Checklist should be completed and complied with.
 - The classification of each component loaded as part of the blending activity should be known and should be stated on the ADN Checklist
 - Upon completion of the blending operation a transport document stating the component added, same as stated on the ADN checklist, has to be provided to the carrier
 - For the final product a corresponding and complete transport document has to be provided to the carrier
 - The transportation of the product, voyage, can only commence if the carrier has received the transport document for the final product
 9. The blending on board as an activity might need further amendments in ADN Chapter 1.2.1 on the subject of Definitions and in ADN Chapter 7.2 on the subject of specific operational requirements as specified under point 8.
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