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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)

Thirty-sixth session

Geneva, 27-31 January 2020 Item 5 (b) of the provisional agenda

Proposals for amendments to the Regulations annexed to ADN: other proposals

Corrections to ADN 2019

Transmitted by the Recommended ADN Classification Societies*,**

Summary

Related documents:

Informal documents INF.6 (France) and INF.13 (Recommended ADN Classification Societies), presented at the thirty-fifth session;

ECE/TRANS/WP.15/AC.2/72, para. 36

"36. The Safety Committee considered informal document INF.13 and noted a number of comments mainly on the principles of inserting appropriate transitional provisions. The Recommended ADN Classification Societies were urged to prepare in due time an official document for consideration by the Committee at its

forthcoming session."

Introduction

1. At the seventeenth meeting of the Informal Group of Recommended ADN Classification Societies in March 2019 it has been discussed that some requirements of ADN 2019 for pushed convoys with a tank vessel carrying dangerous goods seems to be wrong or makes no sense for vessels which are part of a convoy. The underlined paragraphs were

^{*} Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR/ZKR/ADN/WP.15/AC.2/2020/17.

^{**} In accordance with the programme of work of the Inland Transport Committee for 2018–2019 (ECE/TRANS/2018/21/Add.1, cluster 9.3).

indicated to be discussed: ..., 9.3.3.0.1, $\underline{9.3.3.0.3}$ (d), 9.3.3.0.5, 9.3.3.10.1, $\underline{9.3.3.10.2}$, 9.3.3.10.5, ...

- 2. Further the Classification Societies concluded that there exists some problems with the transitional provisions in 1.6.7.2.2.2 for the paragraphs 7.2.2.19.3 and 7.2.2.19.4 for pushed convoys with tank vessels.
- 3. The Informal Group submitted informal document INF.13 of the thirty-fifth session for a first discussion about the further handling of these points. As a result of the discussion at the thirty-fifth session of the ADN Safety Committee the Classification Societies submitted the proposals below.

I. Pushed convoys and side-by-side formations (Tanker) - ADN 7.2.2.19.3

4. The required paragraph 9.3.3.0.3 (d) mentioned in 7.2.2.19.3 does no longer exists in ADN 2019.

Proposal

5. Change the reference in 7.2.2.19.3 to "9.3.3.0.3 – last paragraph" in the next version of ADN because this paragraph has the same content as 9.3.3.0.3 (d) in the version of ADN 2017.

Consequences and feasibility

6. The Safety Committee could discuss how to handle this obviously formal error until a new version of ADN will come into force.

II. Pushed convoys and side-by-side formations (Tanker) - ADN 7.2.2.19.3

- 7. The required paragraph 9.3.3.10.2 mentioned in 7.2.2.19.3 is not applicable to vessels used for propulsion, e.g. push boats, because this paragraph deals with the protective coaming above the cargo tank bulkheads and normally such coaming in accordance with 9.3.3.10.2 cannot be arranged on a push boat. A cargo tank bulkhead does not exist at this kind of vessels and the coaming makes no sense because liquids cannot run directly on the deck of this vessel.
- 8. In ADN 2017 paragraph 9.3.3.10.2 deals with the coaming heights of openings outside the cargo area:

"Outside the cargo area, the lower edges of door-openings in the sidewalls of superstructures and the coaming of access hatches to under-deck spaces shall have a height of not less than 0.50 m above the deck.

This requirement need not be complied with if the wall of the superstructures facing the cargo area extends from one side of the ship to the other and has doors the sills of which have a height of not less than 0.50 m above the deck. The height of this wall shall be not less than 2.00 m. In this case, the lower edges of door-openings in the sidewalls of superstructures and the coamings of access hatches behind this wall shall have a height of not less than 0.10 m above the deck. The sills of engine room doors and the coamings of its access hatches shall, however, always have a height of not less than 0.50 m."

9. A similar paragraph does not exist in ADN 2019, but the above-mentioned requirements are partly contained in paragraph 9.3.3.10.4 of ADN 2019:

"On deck, the lower edges of door-openings in the sidewalls of superstructures and the sills of hatches and ventilation openings of premises located under the deck shall have a height of

not less than 0.50 above the deck. This requirement does not apply to access openings to double-hull spaces and double bottoms."

Proposal

10. Replace the reference to 9.3.3.10.2 by 9.3.3.10.4 in 7.2.2.19.3 in the next version of ADN.

Consequences and feasibility

- 11. The Safety Committee could discuss how to handle this reference until a new version of ADN will come into force.
- 12. Is it allowed to ignore this requirement at ADN renewal surveys and to insert a remark into the certificate of approval that this paragraph is not applicable for the vessel?

III. Transitional provision for 7.2.2.19.3

- 13. The transitional provision for 7.2.2.19.4 "Vessels of the formation for which explosion protection is required" contains also transitional provisions for vessels used for propulsion and it seems that the content of this transitional provision obviously handles with the content of 7.2.2.19.3 which contains the requirements for vessels used for propulsion.
- 14. With respect to the above mentioned proposals the transitional provisions for 9.3.3.0.3 (d) and 9.3.3.10.2 have to be adapted.

Proposal

15. Adapt the transitional provision table in 7.2.2.19.3 as shown below:

Vessels used for propulsion Adaptation to new provisions Provisions of 9.3.3.12.4, 9.3.3.51 and 9.3.3.52.1 to 9.3.3.52.8	Until that date, the following requirements apply to vessels in service:
	Vessels moving a pushed convoy or a side-by-side formation shall comply with the requirements of the following sections, subsections and paragraphs: 1.16.1.1, 1.16.1.2, 1.16.1.3, 7.2.2.5, 8.1.4, 8.1.5, 8.1.6.1, 8.1.6.3, 8.1.7, 9.3.3.0.1, 9.3.3.0.3 (d),9.3.3.0.3 last paragraph, 9.3.3.0.5, 9.3.3.10.1, 9.3.3.10.2, 9.3.3.10.4, 9.3.3.12.4 (a) except the wheelhouse, 9.3.3.12.4 (b) except for the t90 response time, 9.3.3.12.4 (c), 9.3.3.12.6, 9.3.3.16, 9.3.3.17.1 to 9.3.3.17.4, 9.3.3.31.1 to 9.3.3.31.5, 9.3.3.32.2, 9.3.3.34.1, 9.3.3.34.2, 9.3.3.40.1 (although a single fire or ballast pump is sufficient), 9.3.3.40.2, 9.3.3.41, 9.3.3.50.1 (c), 9.3.3.50.2, 9.3.3.51, 9.3.3.52.6, 9.3.3.52.7, 9.3.3.52.8, 9.3.3.56.5, 9.3.3.71 and 9.3.3.74, when at least one vessel of the convoy or side-by-side formation is carrying dangerous goods.
	Vessels moving only type N open tank vessels do not have to meet the requirements of paragraphs 9.3.3.10.1, 9.3.3.10.2 and 9.3.3.12.6. These derogations shall be specified in the certificate of approval or the provisional certificate of approval as follows: "Permitted derogations": "Derogation from 9.3.3.10.1, 9.3.3.10.2 and 9.3.3.12.6; the vessel may only move type N open tank vessels."

IV. Transitional provision for 7.2.2.19.4

16. The second part of the transitional provision for 7.2.2.19.4 was transferred to 7.2.2.19.3 and has to be adapted.

Proposal

17. Adapt the transitional provision table for 7.2.2.19.4 as shown below:

7.2.2.19.4	Vessels of the formation for which explosion protection is required	N.R.M. from 1 January 2019 Renewal of the certificate of approval after 31 December 2034
		Until that date, the following requirements apply to vessels in service:
		Vessels moving a pushed convoy or a side by-side formation shall comply with the requirements of the following sections, subsections and paragraphs: 1.16.1.1, 1.16.1.2, 1.16.1.3, 7.2.2.5, 8.1.4, 8.1.5, 8.1.6.1, 8.1.6.3, 8.1.7, 9.3.3.0.1, 9.3.3.0.3 (d), 9.3.3.0.5, 9.3.3.10.1, 9.3.3.10.2, 9.3.3.12.4 (a) except the wheelhouse, 9.3.3.12.4 (b) except for the t90 response time, 9.3.3.12.4 (c), 9.3.3.12.6, 9.3.3.16, 9.3.3.17.1 to 9.3.3.17.4, 9.3.3.31.1 to 9.3.3.31.5, 9.3.3.32.2, 9.3.3.34.1, 9.3.3.34.2, 9.3.3.40.1 (although a single fire or ballast pump is sufficient), 9.3.3.40.2, 9.3.3.41, 9.3.3.50.1 (c), 9.3.3.50.2, 9.3.3.51, 9.3.3.52.6, 9.3.3.52.7, 9.3.3.52.8, 9.3.3.56.5, 9.3.3.71 and 9.3.3.74, when at least one vessel of the convoy or side by side formation is carrying dangerous goods.
		Vessels moving only type N open tank vessels do not have to meet the requirements of paragraphs 9.3.3.10.1, 9.3.3.10.2 and 9.3.3.12.6. These derogations shall be specified in the certificate of approval or the provisional certificate of approval as follows: "Permitted derogations": "Derogation from 9.3.3.10.1, 9.3.3.10.2 and 9.3.3.12.6; the vessel may only move type N open tank vessels.".