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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)****Fortieth session**

Geneva, 22–26 August 2022

Item 3 (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****Supervision of loading and unloading, supervision from the shore****Transmitted by the Government of the Netherlands\*\*\****Summary*

<b>Executive summary:</b>	None
<b>Action to be taken:</b>	None
<b>Related documents:</b>	ECE/TRANS/WP.15/AC.2/2015/18 (The Netherlands) ECE/TRANS/WP.15/AC.2/2015/32 (Germany) ECE/TRANS/WP.15/AC.2/56, paras. 16-19 – Report of the twenty-seventh session

**Introduction**

1. During the twenty-seventh session of the ADN Safety Committee, three national interpretations from the Netherlands were discussed. One of the interpretations adopted by the ADN Safety Committee was the interpretation on the supervision during loading and unloading operations, 8.6.3, question 10 (under 7.2.4.25.5 on the UNECE website).

\* Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/WP.15/AC.2/2022/49.

\*\* A/76/6 (Sect.20), para. 20.76.



2. The interpretation concerns the supervision during the loading and unloading on board and on the shore. Supervision from the shore can be done using (additional) technical means, and has to be executed by the filler/unloader. The supervision from the shore, according to the interpretation, has to include a radius of at least 3 meters around the manifold through which the loading or unloading takes place. In the practice this means that supervision from the shore in many cases is limited to the 3 meters around the manifold.

3. The Dutch inspectorate has found that not all incidents, that occur during loading and unloading, occur within the area of 3 meters surrounding the manifold through which the loading and unloading takes place. When an incident occurs outside the 3 meters surrounding the manifold, the incident is not noticed through supervision from the shore. This potentially leads to delayed response during these incidents, which can lead to larger spills. Moreover, the incident must therefore be noticed by the person on board the vessel, who is likely to be more directly exposed to the spilled substance, and could therefore react in panic, become unwell, and/or become injured (slipping in spilled product).

4. The Dutch delegation would like to discuss, among the states members of the ADN Safety Committee, whether the area of supervision from the shore side should be enlarged to enable the shore supervision to also notice spills outside the 3-meter radius from the manifold. This could potentially shorten reaction times, resulting in smaller spills. More important, incidents are more likely to be noticed by persons farther removed from the incident, decreasing the chances of personal exposure and panic reactions, leading to more level-headed decision making in the response to incidents.

5. The relevant interpretation is included in the annex to this proposal, ADN 8.6.3.

6. If the ADN Safety Committee agrees with the Dutch delegation that supervision from the shore should be increased beyond the area immediately surrounding the manifold, the standing interpretation should be amended. However, it might also be necessary to amend ADN 8.6.3, question 10 and its explanation as well. The Dutch delegation is willing to prepare a document with adequate proposals to amend the interpretation and/or the ADN.

## Annex

### Supervision

<i>Provision</i>	<i>ADN text</i>	<i>Interpretation</i>
8.6.3, question 10, also relevant: 1.4.3.3 (u) 1.4.3.7.1.1	Is continuous and suitable supervision of loading/unloading ensured for the whole period of the operation?	During loading / unloading effective supervision is to be insured without interruption, ie. permanently.

### Explanation

1. The supervision of loading and unloading operations both on board and on shore has to be executed in such a manner that dangers which may occur in the vicinity of the cargo piping between ship and shore are noticed immediately.
2. When the supervision is executed using (additional) technical means, the shore installation and the vessel have to reach agreement on how this is guaranteed.
3. The effectiveness of the supervision has to be assured. This means that supervision from the vessel and from the shore is arranged in such a way that hazards that can arise are noticed immediately, and under all circumstances.
4. Supervision from the shore has to be executed by the filler/unloader of cargo tanks in the area between the connection of the venting piping (on board) with the vapour return piping (on shore) and the connection of the venting piping (on board) to the manifold in use, including a radius of at least 3 meters around the manifold

### Justification

5. Supervision of the complete process of loading and unloading of a liquid cargo is essential. Any imminent possibility of loss of cargo should be detected immediately, and appropriate measures should be taken.
6. This supervision is the shared responsibility of both the crew on board the vessel and the shore facility that loads or unloads the cargo.
7. Supervision should therefore be carried out continuously during loading and/or unloading procedures.