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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)

#### Forty-first session

Geneva, 23–27 January 2023

Item 5 (b) of the provisional agenda

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

### **Approval of classification societies – Proposal to amend Chapter 1.15 (section 1.15.3) of the Regulations annexed to ADN**

**Transmitted by the Governments of Belgium and Luxembourg\*\* , \*\*\***

#### *Summary*

**Executive summary:** Proposal to amend Chapter 1.15, and specifically section 1.15.3 of the Regulations annexed to ADN.

**Action to be taken:** See paragraphs 11 and 12

**Related documents:**

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\* Reissued for technical reasons on 18 January 2023

\*\* Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/WP.15/AC.2/2023/5.

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



## Introduction

1. Belgium and Luxembourg consider that certain provisions of section 1.15.3 relating to the recognition of classification societies should be modified and propose an amendment to the annexed Regulations to that end.

### I. Background and context

2. The provisions governing the conditions and criteria to be met by classification societies for their recognition within the framework of ADN are set out in section 1.15.3 of the Regulations annexed to ADN (subsections 1.15.3.1–1.15.3.8).

3. There are other international instruments that lay out conditions and criteria with the same purpose, for example, Directive (EU) 2016/1629 of the European Parliament and of the Council of 14 September 2016, laying down technical requirements for inland waterway vessels, amending Directive 2009/100/EC and repealing Directive 2006/87/EC. These conditions and criteria are very similar to those contained in the Regulations annexed to ADN (see the annex to ECE/TRANS/WP.15/AC.2/2020/32).

4. During the consideration of ECE/TRANS/WP.15/AC.2/2020/32, it was noted that the provisions referred to in paragraph 2 may be interpreted in different ways. With a view to harmonizing the Regulations annexed to ADN, it is important that the sections and subsections concerned should be rewritten to ensure a uniform interpretation in all contracting parties.

5. The conditions and criteria laid out in subsections 1.15.3.2–1.15.3.7 do not raise any particular comments.

6. Interestingly, subsection 1.15.3.1, which sets forth general requirements, does not call for any skill or expertise in terms of knowledge of ADN and its annexed Regulations.

7. Subsection 1.15.3.8, which addresses requirements related to the internal quality system, raises several comments:

- It refers to two standards (EN ISO/IEC 17020:2012 (except clause 8.1.3) and ISO 9001 or EN ISO 9001:2015).
- The internal quality system must “be based on the relevant aspects” of these two standards, although the relevant aspects are not explicitly identified.
- The system requires certification of the classification society’s quality system “by an independent body of auditors recognized by the administration of the State in which it is located”.
  - Does the phrase “recognized by the administration of the State in which it is located” refer to the State in which the classification society is located or the State in which the auditing body is located?
  - What is meant by “independent body of auditors”?

### II. Responses to the issues raised in paragraphs 2 to 7 above

8. The responses are as follows:

- The EN ISO/IEC 17020 standard is aimed at “bodies performing inspection”, and classification societies fall into this category; thus, compliance with the provisions of this standard is relevant.
- EN ISO/IEC 17020 (even when its clause 8.1.3 is excluded) covers the requirements of EN ISO 9001:2015, so there is no need to require the internal quality system to refer to both standards; reference to EN ISO/IEC 17020 is sufficient.
- EN ISO/IEC 17020 is essentially based on the concept of accreditation, and this accreditation is accorded, after an audit, by an accreditation body (in general, there is

one such body per State, and these accreditation bodies operate under a regime of mutual recognition).

- Requiring classification societies to be accredited by an accreditation body also resolves the current ambiguity regarding the “independent body of auditors”, since the role of the “independent body of auditors” would be fulfilled by the accreditation body.

9. In this context, it should also be pointed out that, under the regulations drawn up by ECE for the inland transport of dangerous goods, inspection bodies acting within the framework of section 1.8.6 of RID or ADR are subject to accreditation in accordance with standard EN ISO/IEC 17020 (see, for example, subsection 1.8.6.8 of RID/ADR). In the framework of RID/ADR, the inspection bodies carry out their activities on equipment or materials containing a few dozen m<sup>3</sup> of dangerous goods.

10. It is therefore quite logical to have the same requirements for ADN classification societies, whose activities mean that they work on materials or equipment that may contain several thousand m<sup>3</sup> of dangerous goods.

### III. Proposal

11. It is proposed to replace subsection 1.15.3.8 as follows (added text underlined, deleted text in strikethrough):

~~“1.15.3.8 The classification society shall have prepared and implemented and shall maintain an effective system of internal quality based on the relevant aspects of internationally recognized quality standards and conforming to the standards EN ISO/IEC 17020:2012 (except clause 8.1.3) (inspection bodies) and ISO 9001 or EN ISO 9001:2015. The classification society is subject to certification of its quality system by an independent body of auditors recognized by the administration of the State in which it is located.~~

The classification society shall be a Type A inspection body in the meaning of standard EN ISO/IEC 17020:2012.

It shall be accredited in line with EN ISO/IEC 17020:2012 (except clause 8.1.3) by an accreditation body of a contracting party to ADN that is also a member of the International Accreditation Forum (IAF).

A State that is a contracting party to ADN shall recognize an accreditation issued in accordance with the provisions of the preceding paragraph.”

12. Therefore, add to section 1.2.3 (List of abbreviations) of the Regulations annexed to ADN a line concerning IAF as follows:

IAF: International Accreditation Forum, Box 1811, Chelsea Quebec J9B 1A1, Canada, <https://iaf.nu>.